

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:
Attachments:

Hi Lara,

Kevin and I have reviewed s 13(1)

John

From: Lara Gerrits <LGerrits@bcllc.com>
Sent: June-27-19 9:18 PM
To: John Karlovcec <JKarlovcec@bcllc.com>; Kevin deBruyckere <KdeBruyckere@bcllc.com>
Cc: Rob Kroeker <RKroeker@bcllc.com>; Laura Piva-Babcock <LPiva-Babcock@bcllc.com>; Ilana Baxter <IBaxter@bcllc.com>
Subject: RE: For review: FOI 19-048 draft IN

Sounds good. Thank you. s 13(1)

Lara Gerrits
Manager, Media & Issues Management
s 17(1) (mobile)

From: John Karlovcec <JKarlovcec@bcllc.com>
Date: June 27, 2019 at 8:48:16 PM PDT
To: Kevin deBruyckere <KdeBruyckere@bcllc.com>, Lara Gerrits <LGerrits@bcllc.com>
Cc: Rob Kroeker <RKroeker@bcllc.com>, Laura Piva-Babcock <LPiva-Babcock@bcllc.com>, Ilana Baxter <IBaxter@bcllc.com>
Subject: RE: For review: FOI 19-048 draft IN

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Hi John and Kevin,

Thanks for your assistance as we worked through the facts in support of the attached IN for government re: FOI 19-048. I mentioned this to Kevin today,s 13(1)

s 13(1)

If Rob needs to review following or concurrent to your review, I've also CC'd him here .

Thanks!

Cheers,

Lara

Lara Gerrits
Manager, Media & Issues Management
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6
T 604 228 3066 C s 17(1)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From:
Sent:
To:
Subject:

FINTRAC's Contribution Recognized

(La version française suit.)

FINTRAC's financial intelligence was recognized by the Toronto Police Service in Project Kraken, an illicit guns and gangs investigation resulting in 80 arrests and dismantling a street gang allegedly distributing fentanyl in the GTA.

With the financial transaction reports received from Canadian businesses across the country, FINTRAC is providing valuable assistance to law enforcement and national security investigations.

The news release is at the following link:
<http://torontopolice.on.ca/newsreleases/44294>

To unsubscribe from the list, send a message to List-list@canafe-fintrac.gc.ca with only "Unsubscribe" (no quotes) in the subject line.

FINTRAC is an independent federal government agency, operating at arm's length from police, law enforcement and national security agencies, with a mandate to collect, analyze, assess and, where appropriate, disclose information in order to assist in the detection, prevention and deterrence of money laundering and the financing of terrorist activities.

Financial Transactions and Reports Analysis Centre of Canada
24th floor, 234 Laurier Avenue West, Ottawa, Canada K1P 1H7
Government of Canada

Follow us on Twitter: [@FINTRAC_Canada](https://twitter.com/FINTRAC_Canada)

Contribution de CANAFE soulignée

Le Service de police de Toronto Police reconnaît que le renseignement financier de CANAFE a contribué au Project Kraken, une enquête sur les armes à feu illicites et les gangs qui a mené à 80 arrestations et au démantèlement d'une gang de rue qui aurait distribué du fentanyl dans la région du Grand Toronto.

À l'aide des déclarations d'opérations financières reçues des entreprises canadiennes partout au pays, CANAFE offre un soutien important aux enquêtes d'organismes d'application de la loi et de la sécurité nationale.

Le communiqué de presse se trouve au lien suivant (en anglais seulement) :
<http://torontopolice.on.ca/newsreleases/44294>

Pour retirer votre nom de la liste, veuillez transmettre un message à List-list@canafe-fintrac.gc.ca en indiquant uniquement « Désabonnement » (sans guillemets) comme objet du message.

CANAFE est un organisme fédéral autonome qui mène ses activités indépendamment des services de police et des organismes d'application de la loi et de sécurité nationale. Il est responsable de recueillir, d'analyser, d'évaluer et, le cas échéant, de communiquer des renseignements pouvant être utiles à la détection, à la prévention et à la dissuasion du recyclage des produits de la criminalité et du financement des activités terroristes.

Centre d'analyse des opérations et déclarations financières du Canada
234, avenue Laurier Ouest, 24e étage, Ottawa, Canada K1P 1H7
Gouvernement du Canada

Suivez-nous sur Twitter : [@CANAFE_Canada](https://twitter.com/CANAFE_Canada)

Kevin Simcoe

From:
Sent:
To:
Subject:

s 13(1), s 15(1)

Kevin

From: Rob Kroeker <RKroeker@bcllc.com>
Sent: June-28-19 8:13 AM
To: Kevin deBruyckere <KdeBruyckere@bcllc.com>
Subject: RE: eGaming Enhanced Due Diligence (EDD) Reviews - January 1, 2019 through June 30, 2019

Thanks.

From: Kevin deBruyckere <KdeBruyckere@bcllc.com>
Sent: June-28-19 6:47 AM
To: Rob Kroeker <RKroeker@bcllc.com>
Subject: RE: eGaming Enhanced Due Diligence (EDD) Reviews - January 1, 2019 through June 30, 2019

Agreed...I'll review the form and discuss with the team.

Kevin

From: Rob Kroeker <RKroeker@bcllc.com>
Sent: June-27-19 9:09 AM
To: Kevin deBruyckere <KdeBruyckere@bcllc.com>
Subject: RE: eGaming Enhanced Due Diligence (EDD) Reviews - January 1, 2019 through June 30, 2019

s 13(1), s 15(1)

Thoughts?

R

From: Kevin deBruyckere <KdeBruyckere@bcllc.com>
Sent: June-26-19 3:10 PM
To: Rob Kroeker <RKroeker@bcllc.com>
Subject: Fwd: eGaming Enhanced Due Diligence (EDD) Reviews - January 1, 2019 through June 30, 2019

FYI.

Kevin deBruyckere
Director of AML & Investigations
BCLC

Begin forwarded message:

From: Cameron Dodson <CDodson@BCLC.com>

Date: June 26, 2019 at 3:07:22 PM PDT

To: Craig Longley <CLongley@bcl.com>, Paul Stanney <PStanney@bcl.com>, Mark Dickenson <KDickenson@bcl.com>, Jason Lanki <JLanki@BCLC.com>, Rob Stratford <RStratford@bcl.com>, Cameron Dodson <CDodson@BCLC.com>

Cc: Kris Gade <KGade@BCLC.com>, Bruno Gatto <BGatto@bcl.com>, Joseph Depaulo <JDepaulo@BCLC.com>, Kevin deBruyckere <KdeBruyckere@bcl.com>, John Karlovcec <JKarlovcec@bcl.com>, Bal Bamra <BBamra@BCLC.com>, Daryl Tottenham <DTottenham@BCLC.com>, Brad Rudnicki <BRudnicki@bcl.com>, Brandon Norgaard <BNorgaard@bcl.com>

Subject: eGaming Enhanced Due Diligence (EDD) Reviews - January 1, 2019 through June 30, 2019

Hi Everyone,

It is time again for the eGaming Enhanced Due Diligence (EDD) Reviews. For this phase, the reviews will be divvied up between Craig Longley, Jason, Mark, Paul Stanney, Rob and myself. I will be creating the cases early next week and assigning them.

s 13(1), s 15(1)

Please have the EDD Reviews completed by July 31, 2019.

If you have any questions regarding the EDD Reviews, please let me know.

Thanks!
Cam

Cameron Dodson, CAMS

Investigator | Legal, Compliance, Security Division
BCLC, 2940 Virtual Way, Vancouver B.C. V5M 0A6

T 604 228 3098

•Yes, and...•

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We instill public trust by ensuring the highest standards of integrity in gaming

Kevin Simcoe

From:

Sent:

To:

Subject:

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks Rob's 22

Take good care, John

From: Rob Kroeker <RKroeker@bcllc.com>
Sent: June-28-19 8:21 AM
To: John Karlovcec <JKarlovcec@bcllc.com>
Subject: RE: Thanks and Best wishes

Thanks again John.

s 22

Relax and enjoy.

Rob

From: John Karlovcec <JKarlovcec@bcllc.com>
Sent: June-28-19 8:15 AM
To: ALL- Directors <ALL-Directors@BCLC.com>
Cc: Jim D. Lightbody <JDLightbody@bcllc.com>; Rob Kroeker <RKroeker@bcllc.com>; Kevin Gass <KGass@BCLC.com>; Jamie Callahan <JCallahan@bcllc.com>; Brad Desmarais <BDesmarais@bcllc.com>; Amanda Hobson <AHobson@bcllc.com>
Subject: Thanks and Best wishes

Good morning everyone,

Just a quick note to let you all know that today will be my last day of work at BCLC.

I very much appreciate being provided the opportunity to return and work with you all over the past 21 months and being part of the senior executive team.

It's been a privilege to have had a chance to work with such a talented group and I can't thank you all enough for all the support that you have all shown me and the AML & Investigations team over this time period.

As some of you may know, over the past few months I've had the pleasure of working with and transitioning Kevin deBruyckere into the Director AML & Investigations role. Kevin brings a wealth of policing/banking AML investigative knowledge, leadership and expertise to our business that will serve BCLC well in the coming years. The AML & Investigations team is in very good hands and I know that you will all provide Kevin as you did me with any support he may require moving forward.

Moving forward, I wish you all nothing but the absolute best in all aspects of your lives.

Sincerely,

John

John Karlovcec BA Law, CAMS

Interim Director, AML & Investigations
Legal, Compliance, Security | BCLC

2940 Virtual Way, Vancouver BC V5M 0A6
T 604 228 3053 | F 604 225 6488

•Yes, and...•

JKarlovec@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:

Follow Up Flag:
Flag Status: Flagged

John;
On behalf of myself and all of us at BCLC, I want to thank you for your dedication to BCLC and helping us through a very trying time. You have gone above and beyond the call of duty and returning to work after you made the decision to retire is testimony to your strong character.
I wish you all the best's 22
Take good care and you will be missed!
Jim

From: John Karlovcec <JKarlovcec@bclc.com>
Sent: Friday, June 28, 2019 8:15 AM
To: ALL- Directors <ALL-Directors@BCLC.com>
Cc: Jim D. Lightbody <JDLightbody@bclc.com>; Rob Kroeker <RKroeker@bclc.com>; Kevin Gass <KGass@BCLC.com>; Jamie Callahan <JCallahan@bclc.com>; Brad Desmarais <BDesmarais@bclc.com>; Amanda Hobson <AHobson@bclc.com>
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Sincerely,

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John Karlovcec BA Law, CAMS
Interim Director, AML & Investigations
Legal, Compliance, Security | BCLC

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T 604 228 3053 | F 604 225 6488

•**Yes, and...**•

JKarlovec@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From:
Sent:
To:
Subject:

I am out of the office, returning Tuesday, July 2. If you require immediate assistance please contact Sydney Jones.

Thank you,
Ilana

Kevin Simcoe

From:
Sent:
To:
Subject:

Hi,

I am out of the office returning July 8, 2019 at which time I will respond to any outstanding requests. If urgent, please contact Daryl Tottenham at dtottenham@bcllc.com or cell 517(1).

Thanks,
Bal

Kevin Simcoe

From:
Sent:
To:
Subject:

Good morning Rob,
Hope things are going well for you this week. I have booked some time on Wednesday for us to look at your schedule in July and then will reach out to Mario to book this meeting.
Thanks,
Nicole

From: Rob Kroeker <RKroeker@bclc.com>
Sent: Friday, June 28, 2019 8:43 AM
To: Jennifer M. Smith <JMSmith@bclc.com>
Cc: Nicole Wu <NWu@BCLC.com>
Subject: RE: BCLC - Governance and CSR Committee Meeting - Draft Agenda

Okay, thanks.

From: Jennifer M. Smith <JMSmith@bclc.com>
Sent: June-28-19 8:35 AM
To: Rob Kroeker <RKroeker@bclc.com>
Cc: Nicole Wu <NWu@BCLC.com>
Subject: RE: BCLC - Governance and CSR Committee Meeting - Draft Agenda

Yes, very involved. The materials that Suzanne sent you include background material I prepared on the subject but I can also give more context verbally. Mario will see that in the package we send him on July 8.

Jennifer

From: Rob Kroeker <RKroeker@bclc.com>
Sent: Friday, June 28, 2019 8:28 AM
To: Jennifer M. Smith <JMSmith@bclc.com>; Nicole Wu <NWu@BCLC.com>
Subject: FW: BCLC - Governance and CSR Committee Meeting - Draft Agenda

Good morning

Jennifer – were you involved in the skills and evaluation efforts of the last Board?

Nicole – would you please set up a 30 min call for the 3 of us a week before the committee meeting – thank you.

Rob

From: Mario Lee <MarioLee@bclc.com>
Sent: June-27-19 4:58 PM
To: Jennifer M. Smith <JMSmith@bclc.com>
Cc: Rob Kroeker <RKroeker@bclc.com>; Suzanne Rowley <SRowley@bclc.com>; Nicole Wu <NWu@BCLC.com>
Subject: Re: BCLC - Governance and CSR Committee Meeting - Draft Agenda

Thanks Jennifer and Rob,

s 13(1)

As we get closer to the meeting date, I would like to chat with you about items 3.5 Board Skills Matrix, and 3.6 Board Evaluation Survey. Interested in knowing past experiences on how these items were dealt with.

Cheers,
Mario

From: Jennifer M. Smith
Sent: June 27, 2019 11:42:22 AM
To: Mario Lee
Cc: Rob Kroeker; Suzanne Rowley; Nicole Wu
Subject: BCLC - Governance and CSR Committee Meeting - Draft Agenda

Good morning Mario,

Please find attached the draft agenda for the Governance and CSR Committee meeting taking place on July 24.

In accordance with the Board's newly directed pre-meeting process, we understand that you will discuss the agenda with Rob Kroeker, and let me and Suzanne know by **EOD July 2** if you require any changes. If we do not hear from you, we will assume you have no comments and treat the agenda as final.

By **EOD July 8**, we will send you a draft of the meeting materials for your review and discussion with Rob Kroeker. If any changes are required, we ask that you provide that feedback to Rob Kroeker, copying me and Suzanne, as soon as possible with the objective of finalizing all materials by **July 12**.

If you have any questions, please feel free to reach out to me.

Best wishes,
Jennifer

Jennifer M. Smith
Associate Corporate Secretary
BCLC, 2940 Virtual Way, Vancouver B.C. V5M 0A6
T 604 228 3027 F 250 828 5637

IMPORTANT NOTICE: This message is intended only for the use of the individual or entity to which it is addressed. The message may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the original sender immediately by e-mail at jmsmith@bclc.com. **DO NOT FORWARD THIS EMAIL.**

Kevin Simcoe

From:
Sent:
To:
Subject:

Please note I am away from the office returning July 17th. Please contact Jennifer Keim at jkeim@bcllc.com if your matter is urgent.

Kevin Simcoe

From:
Sent:
To:
Subject:

I will be away from the office until Tuesday, July 2, 2019. If this is regarding an urgent matter, please forward to eGamingInvestigation@bcl.com

Thank you!

Cameron Dodson, CAMS
Investigator | Legal, Compliance, Security Division

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:
Attachments:

Hi Rob,

This note is specific to FOI 19-048;s 13(1)

Cheers,

Lara

Lara Gerrits

Manager, Media & Issues Management
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6
T 604 228 3066 C s 17(1)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

- BCLC is required to report Large Cash Transactions (LCTs) of \$10,000 or more, and all suspicious transactions. As per FINTRAC requirements and all BCLC Anti-Money Laundering (AML) training materials and directives to Service Providers, any transaction(s) totaling \$10,000 or more within 24 hours must be reported as a LCT within 15 days of occurring.
- Casino employees are required to be aware of and look for indicators involved in financial transactions that may suggest the transaction is related to the commission of, or an attempted commission of, a money-laundering or terrorist-activity financing offence. When/if observed, an Unusual Financial Transaction (UFT) report is created and submitted to BCLC. The incident is reviewed by BCLC's AML Unit to determine if there are reasonable grounds to suspect that a transaction may be related to potential proceeds of crime, money laundering and/or terrorist-activity financing – in which case BCLC's AML Unit will submit a Suspicious Transaction Report (STR) to FINTRAC. BCLC also sends STRs to GPEB and the RCMP.
- BCLC submits all STRs to FINTRAC, which analyzes reports for patterns of, or individuals involved in, money laundering. FINTRAC reports suspected instances of money laundering to police for investigation and enforcement.
- During regular monitoring and review of transactions in November 2015, BCLC became aware that River Rock Casino staff was not reporting UFTs under \$50,000 to BCLC. BCLC proactively disclosed the issue to FINTRAC in December 2015 and reported the same to GPEB.
- BCLC reviewed all daily LCT records from River Rock Casino over a 14-month timeframe (Sept 2014 - Oct 2015). BCLC found that River Rock staff had reported all LCTs accurately, but found 266 unreported UFTs, with a combined value

of \$21 million. BCLC subsequently reported these as STRs to FINTRAC, GPEB and the RCMP and took immediate action to address the issue.

- BCLC immediately required River Rock Casino to submit daily reports of all cash buy-ins for BCLC's review, in order to ensure compliance and enable BCLC to address any further misunderstandings of AML requirements. River Rock Casino continues to send daily cash buy-in reports to BCLC.
- BCLC conducted remedial AML training for all required staff at River Rock Casino in December 2015 to ensure all policies and procedures were understood and followed, and also reviewed its own processes and procedures in consultation with FINTRAC and GPEB.
- In early 2016, BCLC also reviewed the reporting processes of the other Lower Mainland casinos and did not find any other compliance issues.

From: Rob Kroeker <RKroeker@bclc.com>

Sent: June-28-19 8:23 AM

To: Lara Gerrits <LGerrits@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>; Kevin deBruyckere <KdeBruyckere@bclc.com>

Cc: Laura Piva-Babcock <LPiva-Babcock@bclc.com>; Ilana Baxter <IBaxter@bclc.com>

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Lara Gerrits

Manager, Media & Issues Management

s 17(1) (mobile)

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s 13(1)

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Lara

Lara Gerrits

Manager, Media & Issues Management
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6
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INFORMATION NOTE

British Columbia Lottery Corporation

Date: June 27, 2019

BCLC FOI 19-048: BCLC STR and SAS Emails

Key Facts:

On May 22, 2019, BCLC received the following FOI request from an individual: "1. Copy of all emails sent by Ross Alderson to Robert Kroeker dated Sept 22, 2016 in which SAS or AML software is mentioned. Also a copy of the response; and 2. Any emails from 2011/2012 authored by Ross Alderson regarding a \$50K STR threshold at River Rock Casino."

BCLC is releasing five pages of responsive records, which are e-mails written by Ross Alderson, BCLC's former Director of Anti-Money Laundering (AML), between 2011 and 2017. Two of the pages are responsive to the first part of the request and three pages are responsive to the second part of the request. The records are heavily redacted; BCLC is withholding information from disclosure under sections 13 (policy advice or recommendations), 15 (harm to law enforcement) and 17 (harm to the financial or economic interests of BCLC) of FIPPA. These records will be published a minimum of five business days after release at: <https://corporate.bclc.com/who-we-are/corporate-reports/reports-disclosures.html>

Of note:

p. 3: February 2012 response from Alderson to BCLC security staff regarding River Rock Casino and Resort (RRCR) \$50k threshold reporting concerns, including the following statement: *"I hope if/when Fintrac do an audit that response satisfies them under the 'risk management' strategies we have in place. I have my doubts whether it would, especially considering the scenarios found in our AML on line training and the fact that other sites are reporting a lot less amounts."*

p. 3-4: Feb 2012 BCLC's John Karlovcec email to several security and AML staff outlining concerns that RRCR isn't reporting suspicious transactions and emphasizing *"when in doubt they should create an incident file and we will follow up with it."*

p. 4: February 2012 email from GPEB's Derek Dickson to Karlovcec about the fact there is a noticeable trend where RRCR is not submitting Section 86 reports regarding suspicious cash buy-ins where \$100 bills are presented: *"On at least one occasion recently the BCLC investigators discovered that a patron had left the RRCR several times and returned shortly thereafter with large amount of cash in \$100 denomination. The total was approximately \$5000,000 [sic] and RRCR was directed to forward an 86."*

p. 5: September 2011 email from Alderson to former BCLC Security Manager Gord Friesen and Karlovcec stating concerns around patrons buying in with large quantities of \$20 bills, while barely missing the STR threshold reporting amount of \$50k: *"We have had some recent files where we have patrons buy in for \$49,960.00 and \$49,980 in \$20's and we have found out through further investigation."*

Background:

The matter of River Rock underreporting transactions less than \$50,000 was addressed by Dr. Peter German as part of his 2018 independent review. In his report, Dr. German noted that, *"What seems clear is that for a period of time during the huge cash influx at River Rock, the casino stopped filing UFTs for suspicious buy-ins under \$50,000. By River Rock not completing these UFTs, BCLC did not receive the information it requires to create STRs for submission to FINTRAC."*

"The result was an apparent violation of the POCMLTFA and its regulations. This reporting anomaly was mentioned by numerous interviewees, none of whom appear to have a complete understanding of what occurred. Fingers were pointed in various directions."

Dr. German noted that, according to Great Canadian, *"GPEB approached the River Rock and asked the casino to report every cash buy-in involving batches of \$20 bills, as if they were all suspicious transactions. The River Rock objected, noting that many transactions involving \$20 bills are not necessarily suspicious. According to GCGC, a saw off was agreed upon, whereby the casino would report every transaction involving more than \$50,000 in cash as suspicious. Over time, staff assumed that this was the reporting threshold for suspicious transactions and stopped reporting many (or most) suspicious transactions below \$50,000."*

Dr. German also noted in his review that he spoke with the GPEB official who allegedly had the conversation with Great Canadian, and that official *"categorically denies ever agreeing to a threshold. If anything, he was arguing for the opposite – greater reporting than required under the legislation. It was also his recollection that at least one BCLC employee was aware that River Rock was using a \$50,000 threshold."*

A 2016 MNP report on AML – which GPEB released publically on September 22, 2016 – also notes that *"During our interviews with the Service Provider, BCLC, and GPEB, there was ongoing reference to a historical undocumented threshold of \$50,000 which was the trigger value to consider a transaction suspicious at the Service Provider location."*

BCLC Response Points:

- BCLC is committed to ongoing improvement of its anti-money laundering (AML) program and working with service providers, law enforcement and regulators to keep B.C. casinos safe.
- Today, BCLC continues to actively work with the Government, including the Deputy Minister Committee on AML, the AML secretariat, the Gaming Policy and Enforcement Branch and others to address recommendations set out in Dr. Peter German's 2018 independent review of AML policies and practices in Lower Mainland casinos.
- BCLC is required to report Large Cash Transactions (LCTs) of \$10,000 or more, and all suspicious transactions. As per FINTRAC requirements and all BCLC AML training materials and directives to Service Providers, any transaction(s) totaling \$10,000 or more within 24 hours must be reported as a LCT within 15 days of occurring.
- Casino employees continue to be required to be aware of and look for indicators involved in financial transactions that may suggest the transaction is related to the commission of, or an attempted commission of, a money-laundering or terrorist-activity financing offence.
- When/if observed, Service Providers were – and continue to be – required to create and report an Unusual Financial Transaction (UFT) to BCLC. The incident is reviewed by BCLC's AML Unit to determine if there are reasonable grounds to suspect that a transaction may be related to potential proceeds of crime, money laundering and/or terrorist-activity financing – in which case BCLC's AML Unit will submit a STR to FINTRAC. BCLC also sends STRs to GPEB and the RCMP.
- In any instances where BCLC became aware of its Service Providers not adhering to, or misinterpreting reporting requirements, BCLC's process was to record and report the transactions to FINTRAC and follow up with the Service Provider to ensure understanding of AML requirements.

	Name	Number
Program Area Contact:	Laura Piva-Babcock	T: 250-828-5576

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks. I will set this up.

From: Rob Kroeker <RKroeker@bcllc.com>
Sent: Friday, June 28, 2019 12:34 PM
To: Nicole Wu <NWu@BCLC.com>
Subject: Re: BCLC & GPEB meeting request for July 16 to 19

Yes I am but Kevin and I should have a pre meet just 15 min

R Kroeker

On Jun 28, 2019, at 10:43 AM, Nicole Wu <NWu@bcllc.com> wrote:

Rob,
Just FYI as Kevin thinks your attendance is optional. Let me know if we should schedule a time/date that you and Kevin both can attend.
Thanks,
Nicole

From: Kevin deBruyckere <KdeBruyckere@bcllc.com>
Sent: Friday, June 28, 2019 10:34 AM
To: Nicole Wu <NWu@BCLC.com>
Subject: RE: BCLC & GPEB meeting request for July 16 to 19

I'm good with the 16th at the proposed times, and after 10 on the 19th. Probably best at our office.

Thanks, Kevin

From: Nicole Wu <NWu@BCLC.com>
Sent: June-28-19 10:32 AM
To: Kevin deBruyckere <KdeBruyckere@bcllc.com>
Subject: FW: BCLC & GPEB meeting request for July 16 to 19

Hi Kevin,
FYI. Let me know if you would like me to reply them on your preference of time/day. Would you need Rob to be in that meeting? If so I will send some options to them but it may have to wait till late July due to his heavy travels for most part of the month.
Thanks,
Nicole

From: Troll, Stephanie D GPEB:EX <Stephanie.Troll@gov.bc.ca>
Sent: Friday, June 28, 2019 10:24 AM
To: Nicole Wu <NWu@BCLC.com>
Subject: BCLC & GPEB meeting request for July 16 to 19

Good morning Nicole,

Please forward this request to the correct person if you do not look after Kevin's scheduling. Anna Fitzgerald and Tim Storms would like to meet for one hour with Kevin deBruyckere to discuss the ongoing Source of Funds and German Recommendations updates. They will be happy to meet him at the Vancouver BCLC office. Their first available week is the middle of July. Please let me know if Kevin is available to meet at any of the times available below.

16th: 9:30 to 11:30 am

17th: after 1 pm

19th: anytime

Thanks,

Stephanie Troll, Administrative Assistant
Gaming Policy and Enforcement Branch
Compliance Division, Audit
#220-4370 Dominion Street
Burnaby, BC V5G 4L7

604 398-6268 (M-F, 8:30 am-1:00 pm)

If you believe that you have received this email in error, please notify the sender and delete the email from your mailbox.

Kevin Simcoe

From:
Sent:
To: s 22

Cc:
Subject:

Hello Everyone,

On behalf of our Communications Department, please find below a summary of relevant BCLC media coverage from June 25 - 28, 2019.

Anti-Money Laundering

StarMetro Vancouver, June 28, 2019: [Kenyan journalist shows how financial crimes hurt](#)

Vancouver Sun, June 26, 2019: [International co-operation key to combat financial crime: conference](#)

Lottery

Aldergrove Star, June 24, 2019: [Half million dollars guarantees Aldergrove man a new truck](#)

Burnaby Now, June 24, 2019: [I'm happy for this Lotto Max winner, even if he is an Oilers fan](#)

Kind Regards,

Suzanne Rowley
Assistant Corporate Secretary/EA
President's Office, BCLC

2940 Virtual Way, Vancouver BC V5M 0A6
T 604 225 6399
srowley@bclc.com
bclc.com

Kevin Simcoe

From:
Sent:
To:

Cc:
Subject:
Attachments:

Hi All,

Please find attached the Internal market scan which documents BCLC's business performance in FY2019. The market scan is a Board of Directors deliverable and is intended to inform conversations with them.

Please review and provide feedback by noon on July 8th.

If you have any questions, please contact me – otherwise I look forward to your feedback.

Have a great weekend.

Cat

Catrin Roberts
Business Architect, Corporate Strategy
President's Office
BCLC, 2940 Virtual Way, Vancouver, BC V5M 0A6
T 604 225 6293 C s 17(1) F 604 225 6424

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.



BCLC Business Performance

June 2019

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Introduction

This following provides an overview of BCLC's internal performance. Unless otherwise stated, results and statistics are obtained from BCLC's Service Plan, Annual Report, market research as well as financial and other internal reporting and analysis. BCLC uses a fiscal year period of April 1 to March 31 in its reporting.

The internal scan is structured around four perspectives:

- Player
- People
- Public
- Profit

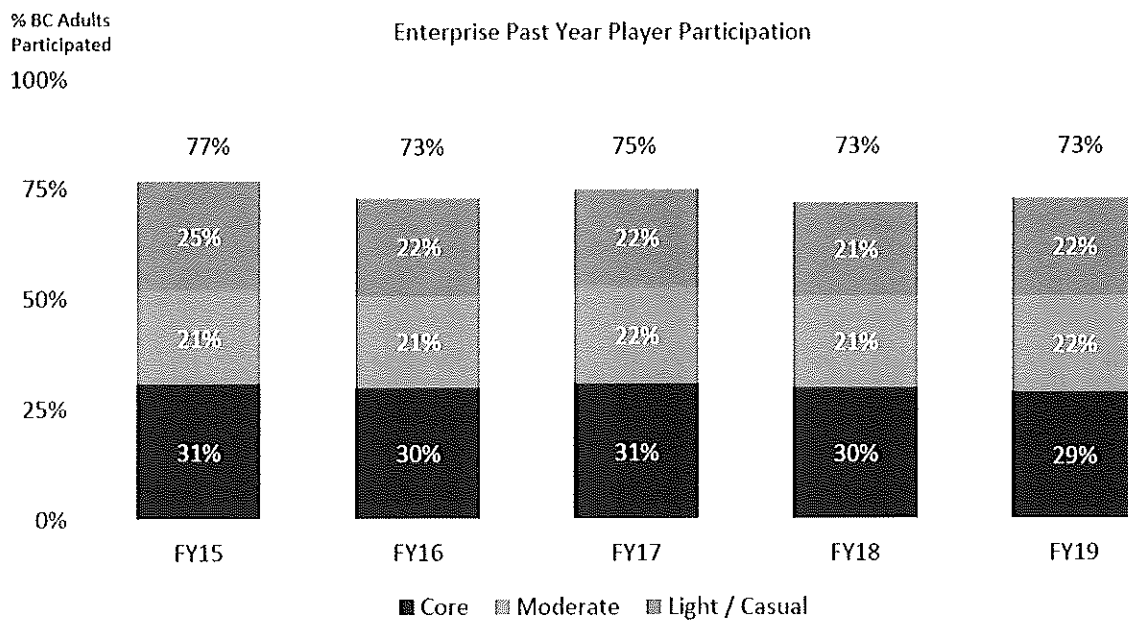
Player

ENTERPRISE

Player Participation

BCLC's games and channels have a wide reach: approximately 2.70 million adult (73 per cent) British Columbians have bought a lottery ticket or played a BCLC game in one of our retail, hospitality, casino or online channels in the past year. *Ipsos, 2019*

In FY19, overall player participation remained stable compared to FY18. The definition for frequency groups are; Core: play weekly, Moderate: play monthly, Light: play every 2-5 months, Casual: play once or twice a year/ or less often.

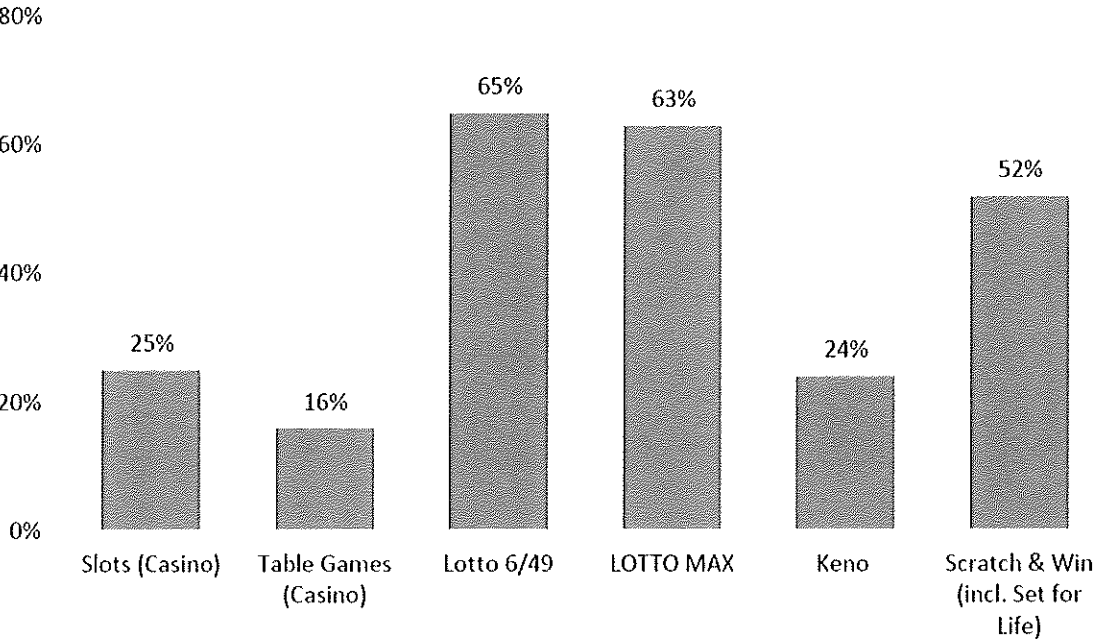


Source: KPI Tracker, Ipsos

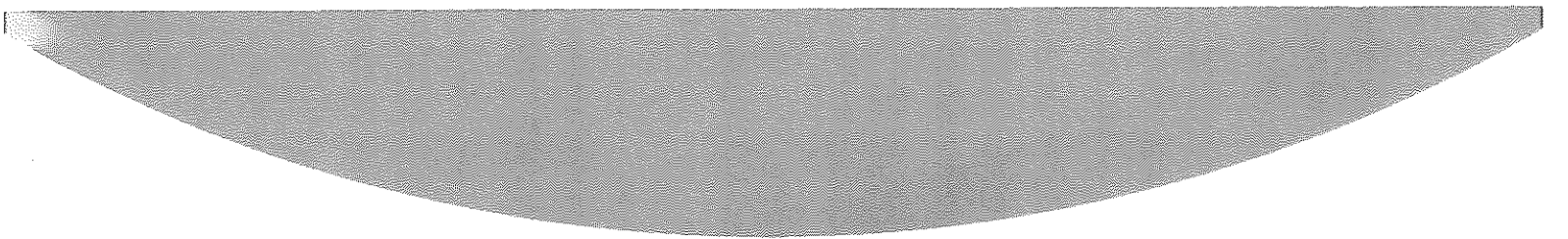
Overall, the long-term trend for player participation is a slow decline.

Big Lotto products continue to have the highest level of participation. 65 per cent of BC’s adult population has ever played Lotto 6/49 and 63 per cent has ever played Lotto Max.

Player Participation (ever played) Core 6 product FY19



Source: KPI Tracker, Ipsos



BC has the highest gaming spend per adult across Canada (excluding VLT's).

Gaming Spend per Adult by Province (excluding VLTs)

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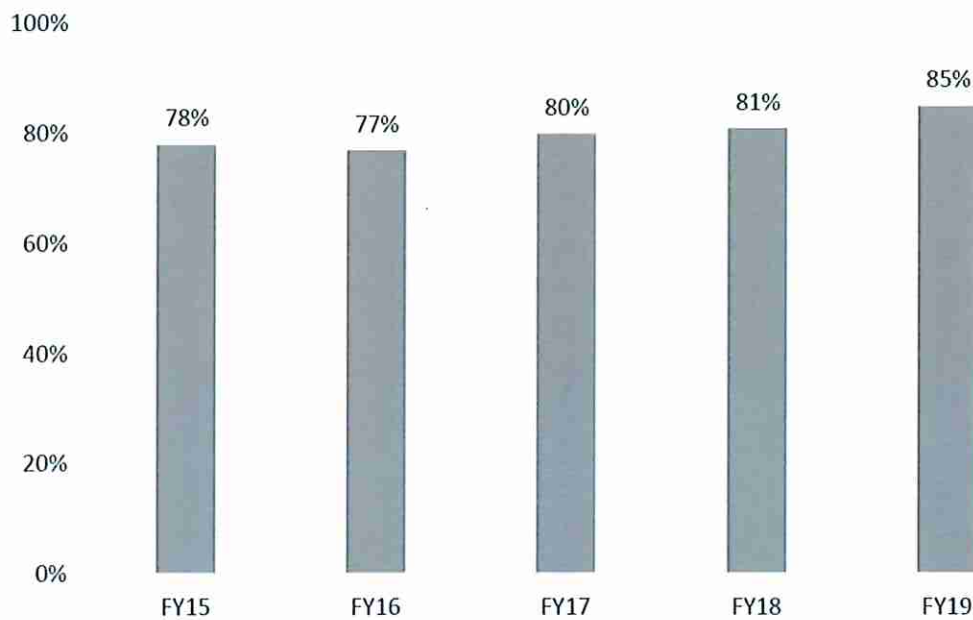
Player Satisfaction

Enterprise Player satisfaction remained high in FY19 compared to FY18. Casino and Lottery had the highest satisfaction at 85 per cent, followed by PlayNow at 81 per cent.

Customer Support Satisfaction

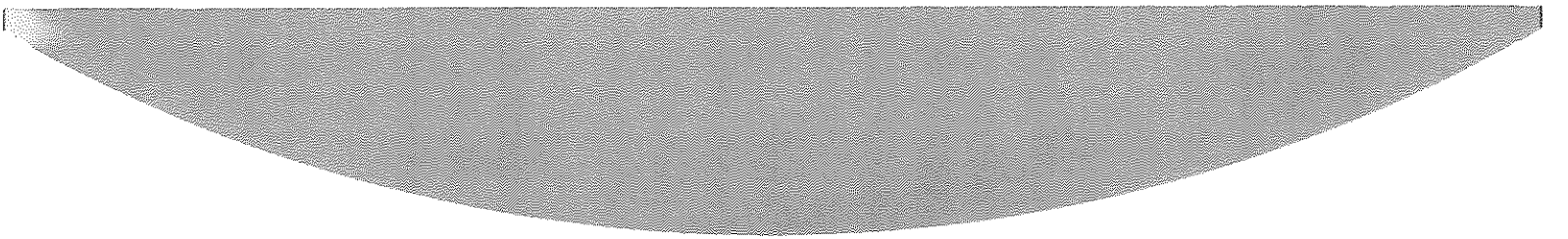
BCLC's Customer Service Centre continues to deliver in the Voice of the Customer results with improved Customer Support Experience scores.

Customer Support Satisfaction



FY19 figures are in line with the five year trend.

Note: in FY20, the Customer Service Centre will be evolving their Voice of the Customer program, which includes switching to a new vendor, broadening collection methods, and revisiting KPIs.



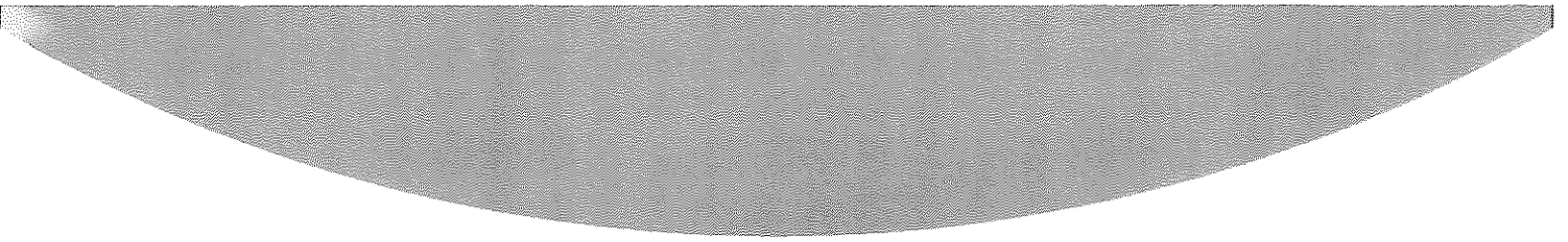
ONLINE PLAY (PLAYNOW.COM)

Player Participation

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Mobile

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Customer Segments

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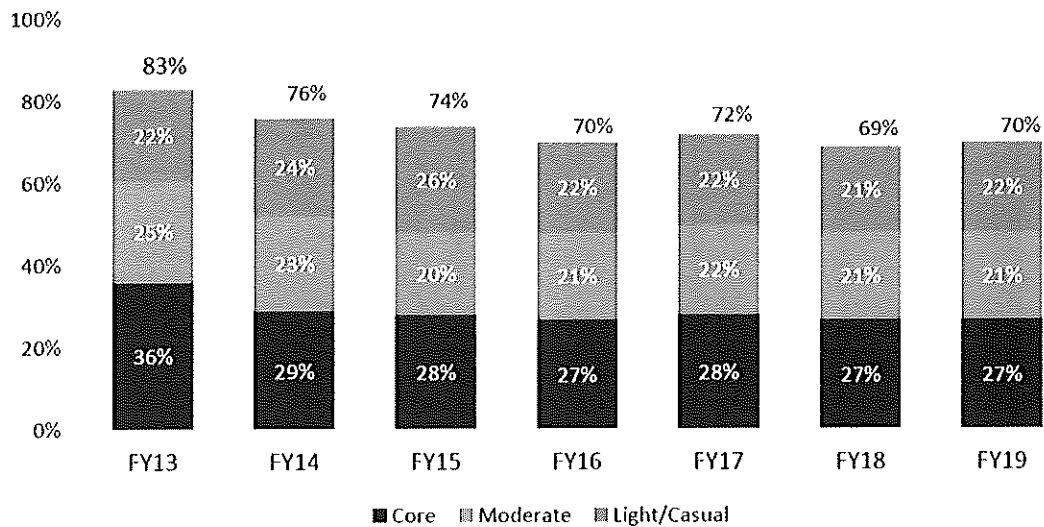
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LOTTERY

Overall Lottery Player Participation

Lottery has the widest player reach of all BCLC channels; in FY19, 70 per cent of B.C. adults purchased at least one lottery ticket at retail or played a lottery game at a bar or pub. *KPI Tracker Ipsos*

Past Year Participation for Lottery
(not including PlayNow)



Source: *KPI Tracker, Ipsos*

Despite an increase in Lotto Max and Lotto 6/49 jackpots, participation remained stable both overall and among each player group YOY. *KPI Tracker*

Big Lotto products continue to have the highest level of participation; 65 per cent of BC's adult population has ever played Lotto 6/49 and 63 per cent has ever played Lotto Max.



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In FY19 Lotto Max had 26 jackpots of \$50M+, compared to 14 instances in FY18; For Lotto 6/49, there were 22 jackpots of \$20M+, compared to 14 in FY18.

Participation in Daily Grand continued to increase in FY19 driven by the increase in awareness from Light and Casual players that supported an overall participation lift.

Participation in Lotto 6/49 remained stable overall in FY19.

Keno Participation decreased YOY in FY19 driven down by the hospitality channel

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CASINO AND COMMUNITY GAMING

Casino, Community Gaming and Bingo Hall Player Participation

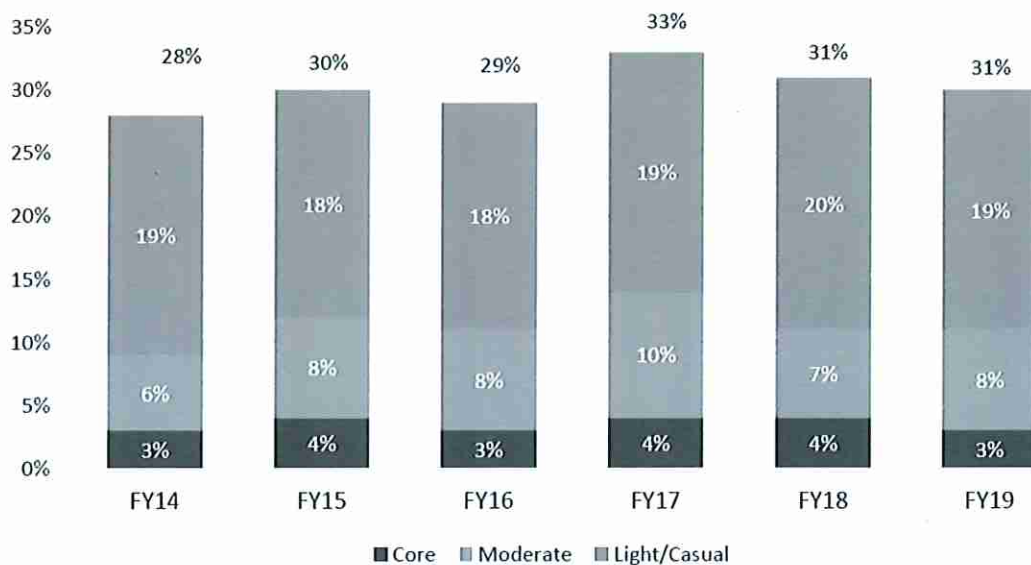
For out of home entertainment, consideration of casinos has increased compared to FY18, moving from six to fifth in ranking of most considered option. This suggests increasing popularity of casinos as an entertainment option in FY19 compared to FY18. Additionally, there were some quarters in FY19 where the ranking increased to #4.

When planning to go out, the top entertainment option considered by British Columbians continues to be going to a restaurant or eating out, followed by movies, and bars/pubs/nightclub/lounges.

For Core / Moderate players, casinos rank as the most popular entertainment option.

31 per cent of adult British Columbians (~1.2 million) have gambled at a facility, either a B.C. casino, community gaming centre or bingo hall, in the past year.

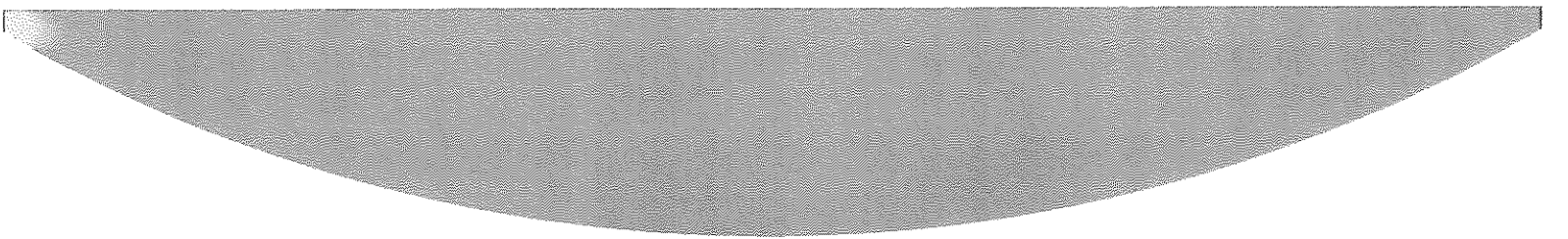
Past Year Participation at Facilities



Source: KPI Tracker, Ipsos

Compared to FY18, past year Facility participation has stayed the same, with a slight decrease from light/casual & core players and a slight increase from the moderate segment. Factors that may have caused these shifts:

- Continued marketing momentum with successful execution of the “Jason Priestley’s night at the casino” campaign by casino marketing.
- Loyalty progress, with the launch of the ability to earn points while dining at casino & community gaming centers and loyalty campaigns designed to incent service providers to increase card usage at casino & community gaming centers.



The successful opening of Elements Victoria, along with the continued refresh of River Rock, with both sites growing their slot win year over year. The facilities team continues to work with service providers to enhance their amenities.

The launch of main floor table games such as War Blackjack, Pai Gow Tiles & Fortune Asia Poker that appeal to the majority of our table games players. Also providing continued support to service providers to keep main floor legacy table games running where demand sees fit.

Encore

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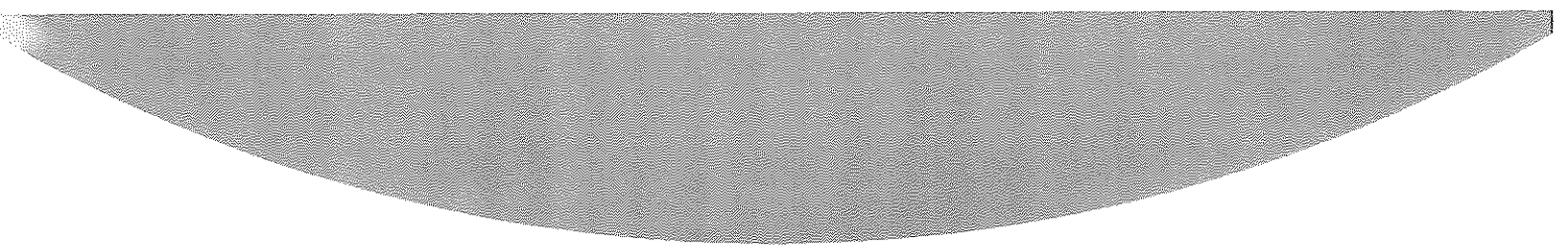
Online Casino

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SPORTS

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PlayNow Sports

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PLAYER HEALTH

BCLC has evolved its approach to responsible gambling by moving from a predominant focus of raising awareness of responsible gambling among players, to a broader focus of influencing player health through targeting players, games and the environment. Collectively referred to as the 'player health plan', this shift in focus integrates four inter-related areas of commitment to increase safer gambling practices and decrease gambling-related harms. These four areas are as follows:

- **Informed Decisions:** giving sufficient and accurate information to players so that they have the foundation to make choices about their gambling that are right for them.
- **Positive play:** encouraging players to adopt attitudes and behaviours associated with healthier play. A focus on the benefits of positive play, rather than the more traditional emphasis on the negative consequences of risky play, result in greater reach and influence.
- **Referral and Support:** Assisting players who are experiencing negative impacts associated with their gambling by interacting with players and concerned others in ways that help them know about, and access the information and resources available in a timely manner.
- **Safer Products and Environments:** identifying opportunities related to gaming product features and the gaming environment to decrease negative impacts. This includes decisions related to products offered, approaches to advertising and marketing and markets served.

A key component of the player health plan is a commitment to monitoring the achievement of objectives through outcome based performance measures. We have developed an evaluation framework that aligns to our four areas of commitment, using multiple sources and metrics to monitor, evaluate and study program impacts and effectiveness.

"Player Awareness of Responsible Gambling Activities" gauges our effectiveness at reaching players with our initiatives and programs so that players can make informed gambling choices.

This measure has been relatively stable (except for 2013/14 which had a dip) with results ranging from the high 70 to low 80 per cent, indicating that a large percentage of players are aware of at least one of our key initiatives. Research & Incite, Ipsos Reid, various years

Performance Measure	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Player Awareness of Responsible Gambling Activities	78%	68%	79%	77%	79%	80%	80%

Source: Research & Insight, Ipsos Reid, various years

2013/14 dipped due to a change in activities to focus on selected player segments and a reduction in mass media advertising.

GameSense Info Centre Interactions of GSAs and players are also used to indicate level of activity

Performance Measure	2014/15	2015/16	2016/17	2017/18	2018/19
GSIC Interactions	56,998	56,098	59,075	48,618	67,785

A major initiative this year was the transfer of the fiscal responsibility and management of the GameSense Advisor program from GPEB to BCLC. With this added responsibility, BCLC invested in enhancing the GameSense information centres and extending the GameSense Advisor presence to 12 community gaming centres, with expansion into the remaining 6 expected to be complete by the fall of 2019.

BCLC refreshed the GameSense program with updated and simplified content made more relevant and accessible to a wide demographic. This includes a new website, expanded marketing campaigns and updated GameSense Info Centres to engage players with healthy gambling tips and information about the risks associated with gambling.

People

BCLC believes, if we look after our people, they will look after our customers and grow our business. BCLC is committed to our employees in the way we compensate, reward, develop and grow our internal resources. BCLC has invested in implementing new Human Resource technology that will support our leaders in making informed business decisions and providing employees with self-serve access to their personal information. We are dedicated to building our talent from within and strategically attracting key talent when necessary. Our HR Talent Strategy is centered upon enhancing our employee's experience, while remaining aligned to our organizational values and culture.

EMPLOYEE ENGAGEMENT

Research consistently shows that an engaged workforce is more productive and committed. Feedback from our employees on how engaged they are, is critical to BCLC's success. Our commitment to an annual employee engagement survey speaks to the importance and value that we place upon our people. BCLC is committed to having a highly engaged workforce. An inspired and engaged workforce will help drive the success of BCLC's business to deliver the great entertainment experiences our players expect.

Engagement refers to those employees who strongly or somewhat agree with our eight engagement index questions.

In 2018/2019, BCLC achieved a strong engagement score of 83 per cent, however, it did not meet the target of 85 per cent. Certain groups of employees have indicated that their engagement has been impacted by the negative media coverage around money laundering. While BCLC recognizes that maintaining high results is a challenge, BCLC is focused on increasing engagement score levels in future years based on its commitment to being an employer of choice and creating an engaging employment experience for all staff. Specifically, BCLC is assessing the results by division and developing targeted action plans to increase engagement and address any declines within each group.

	2013/14 Actual	2014/15 Actual	2015/16 Actual	2016/17 Actual	2017/18 Actual	2018/19 Actual	2019/20 Target	2020/2021 Target
Employee Engagement	78%	83%	N/A ²	87%	86%	83%	86%	86%

2 - In 2015/16, BCLC did not conduct the Employee Engagement survey, hence no results are available.

EMPLOYEE TURNOVER

Employee Turnover Rate measures the combined percentage of voluntary and involuntary turnover relative to BCLC's total headcount. This measure determines how successful BCLC is in attracting and retaining a workforce to drive the continuous optimization of its business, and gauges BCLC's competitiveness in the labour market. It also evaluates the effectiveness of BCLC's training, development, and retention programs.

In 2018/2019, BCLC did not meet the target of 6 per cent for the Employee Turnover measure. The majority of the employees who left this past year indicated the reason was to pursue other career development opportunities.

	2014/15 Actual	2015/16 Actual	2016/17 Actual	2017/18 Actual	2018/19 Actual
Employee Turnover Rate	22.7%	9.6%	5.5%	7.5%	8.9%

Public

KNOWLEDGE AND PERCEPTIONS ABOUT BCLC AND GAMBLING IN B.C.

Public Perceptions about BCLC

In 2018/19, we saw the continuation of a downward trend in both recognition of the positive contributions BCLC makes and perceptions of transparency. This may be due to sustained media coverage of money-laundering allegations at B.C. casinos.

We are implementing the recommendations in Dr. Peter German's independent review of B.C.'s anti-money laundering policies and practices in Lower Mainland casinos. To date, BCLC has completed six of the 11 recommendations for which we are the lead. BCLC has made changes to policies and procedures such as ensuring that BCLC service providers complete a Source of Funds Declaration for any buy-in of \$10,000 or more. At a minimum, the declaration must outline a customer's identification and provide the source of funds, including the financial institution and account from which the cash or instrument was sourced. After two consecutive transactions, cash can only be accepted from the customer once it has been determined that it is not of a suspicious or illegal nature.

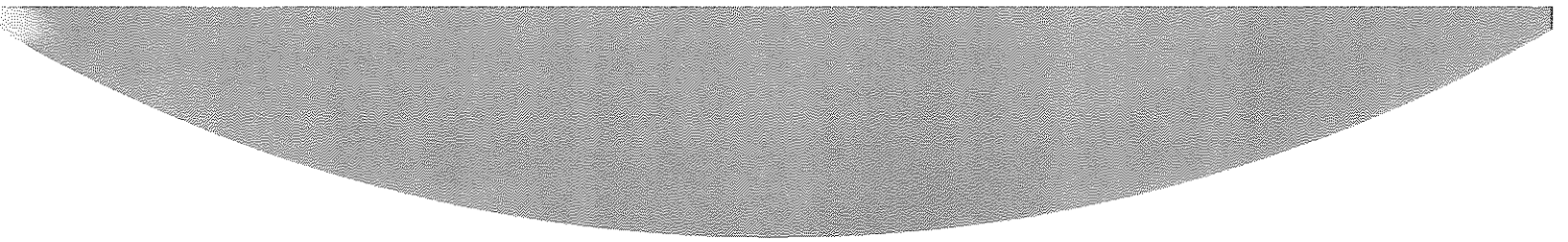
We continued to share information with municipal, business and community stakeholders and the public about BCLC and the gambling industry to create awareness and understanding. We proactively disclosed relevant information about BCLC via bclc.com and the BCLC Social Responsibility Report.

We continued to proactively communicate major corporate initiatives and activities to the public, the media and our employees in order to be transparent, accountable and build awareness and understanding of our organization.

Performance Measure	2014/15	2015/16	2016/17	2017/18	2018/19
Public Recognition of Positive Contributions	68%	68%	73%	70%	68%
Public Perception of BCLC's Transparency	57%	60%	64%	60%	56%
BCLC has a positive impact in the community where I live	53%	53%	60%	55%	55%

Knowledge of where the money goes

In 2018/19, we ran community outreach programs in 13 host communities across the province to educate and engage with the public and stakeholders on how proceeds from gambling and BCLC's sponsorships benefit communities. Activities included municipal information sessions, sponsorships of local events, receptions at local gambling facilities and presentations to local community groups and business associations. A Play it Forward advertising campaign supported these activities, highlighting the various community-specific benefits.



Our Stakeholder Engagement team traveled across the province to meet and engage with municipal elected officials and senior staff at regional conferences to share how Host Local Government revenue benefits their communities.

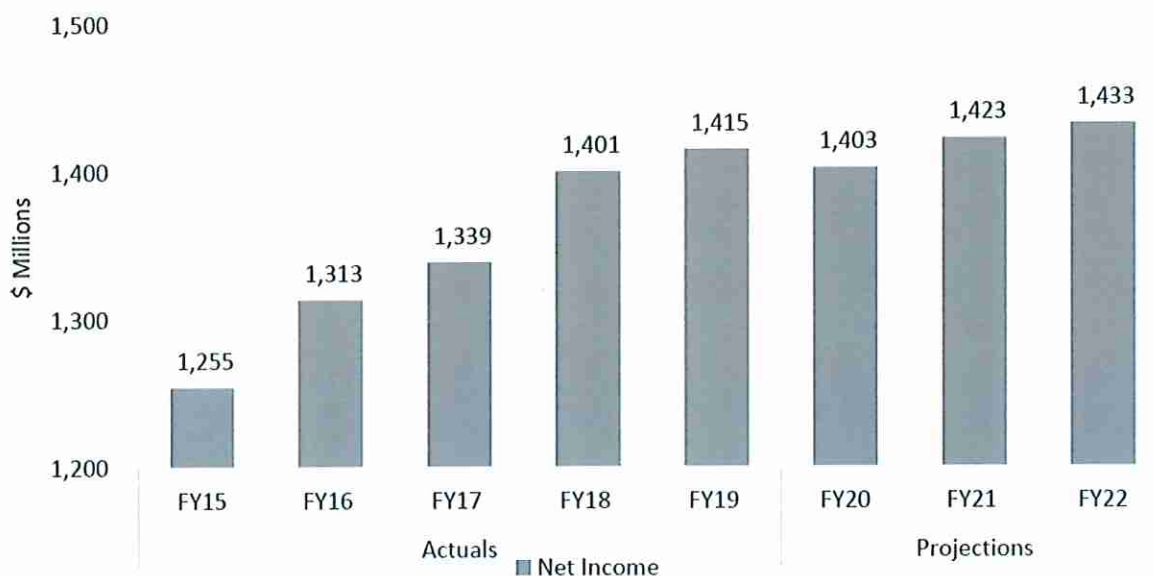
Province-wide, we supported local communities through events and sponsorships. In fiscal 2018/19 BCLC sponsored over 114 organizations, groups and events across the province.

Profit

Note: For all graphs in the profit section, 2019/20-2021/22 targets are per May 2019 Treasury Board Submission which differ from the February 2019 Service Plan. Note that 2018/19 financials include the adoption of International Financial Reporting Standards (IFRS) 9, Financial Instruments and 15, Revenue from Contracts with Customers.

Historical financials (2014/15-2017/18) are as historically reported and do not include any retrospective application of IFRS 9 or 15. Impact of these standards on 2017/18 financials were immaterial. Impact to years prior to 2017/18 are not available.

NET INCOME



The overall gaming industry in B.C. is at a mature stage with stable net income and a modest growth outlook. Net income growth in the past five years is driven by an increase in revenues which has been achieved primarily through increases in slot distribution both in the Bricks and Mortar and online channels and capitalizing on innovation via product enhancements (e.g. change in Lotto Max jackpot cap in FY16) and new product launches (e.g. Live Dealer in late FY18).

In 2018/19, increase in net income was achieved despite declines in revenue from labour disputes at five casino and community gaming locations and the changing table game landscape. BCLC was able to capitalize on opportunities, including the higher than average number of Lotto Max jackpot rolls, strong slot performance in brick-and-mortar facilities and strategic investments in new product offerings such as Live Casino on PlayNow.com.

In 2019/20, net income reflects normalized revenue operations (normalization of high jackpots rolls and resolution of labour disputes in certain casino facilities) and the launch of new initiatives such as Lotto Max enhancements.

Investments to ensure the long-term health of the business will continue with increased focus on the lottery line of business.

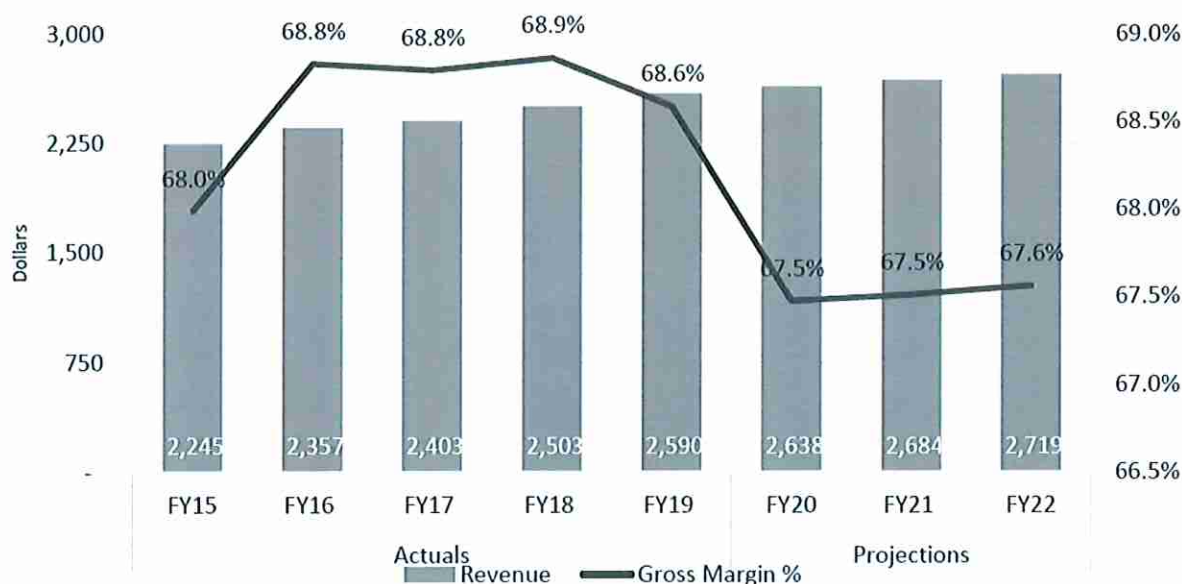
Looking beyond 2019/20, modest growth primarily reflects incremental revenue generated from a new casino site.

For reference, below is the year over year variance commentary for historical net income:

In 2015/16, BCLC strong financial results were primarily achieved through innovation and capitalizing on strategic investments. With the increase in Lotto Max jackpot cap and the record high number of jackpots, the lottery business grew 15.8 per cent over 2014/15 which ranked BCLC as the leading province or state for growth in North America. The slots business growth outpaced every other province in Canada and the eGaming business grew 25 per cent over 2014/15.

In 2016/17 and 2017/18, the financial results were continued to be achieved through innovation and capitalizing on strategic investments primarily in the slots category in both the bricks-and-mortar and online casinos. BCLC's diverse portfolio of products combined with the ability to be flexible and responsive to changing consumer demands and dynamic market conditions has been a key driver of achieving stronger than expected financial results.

REVENUE AND GROSS MARGIN



BCLC's two major business units (lottery and casino) are mature and face market growth challenges. There has been steady historical revenue growth due to increases in distribution of slot products and facility improvements at casino and community gaming sites, continued innovation in the Lottery category and successful launches of new online games and content. Lottery revenues are heavily dependent on national games' jackpot rolls, resulting in lottery revenue volatility. As well, revenues from these business units rely predominantly on a core, aging player base. Growth in the future years relies on increased distribution through a new casino and continued growth online.

BCLC has a diverse portfolio of products which has been a key driver of achieving strong financial results in the past five years. Generally, strong slot growth (in both bricks and mortar and online channels), and high jackpot rolls has been able to offset the downward trend of table game revenue.

Margins are sensitive to shifts in product mix. Gross margin as a percentage of revenue has been fairly steady for the last several years. Gross margin is varied across the business units and across different products. BCLC gross margin is mainly impacted by the product mix of tables (gross margin of ~52.5 per cent) and national Lotto products (gross margin of ~86 per cent). Slot product mix has minimal impact on overall gross margin as the slot GM is close to overall BCLC GM.

s 17(1)

In 2018/19, strong performance was led by the Lottery business, as the big national lottery games (Lotto Max and Lotto 6/49) experienced higher than expected jackpot rolls. This largely contributed to the overall Lottery business unit's year over year revenue growth of 12.6 per cent. eGaming grew almost 25 per cent largely reflecting the success of launching Live Dealer late in fiscal 2017/18.

On the casino side of the business, revenue was close to flat compared with last year, with higher slot machine revenue offset by lower table game revenue. These results should be considered strong as there were labour disputes at five casino sites during the year and a changing table landscape which both had negative impacts on overall casino revenue. Despite these challenges, overall BCLC revenue grew by \$87M or 3.5 per cent.

Starting in 2018/19, the lower gross margin per cent reflects the transition of casino and community gaming service providers to the new Operator Service Agreement (OSA) with a revised commission structure. The year over year decline would have been greater had it not been for favourable product mix (higher Lottery revenue and lower table games revenue).

In 2019/20, revenue is expected to increase, primarily driven by new initiatives that are anticipated to be launched in the market and normalized revenue following the resolution of the labour disputes in certain casino facilities. This projected increase in net income is expected to be partially offset as Lotto Max and Lotto 6/49 jackpots are

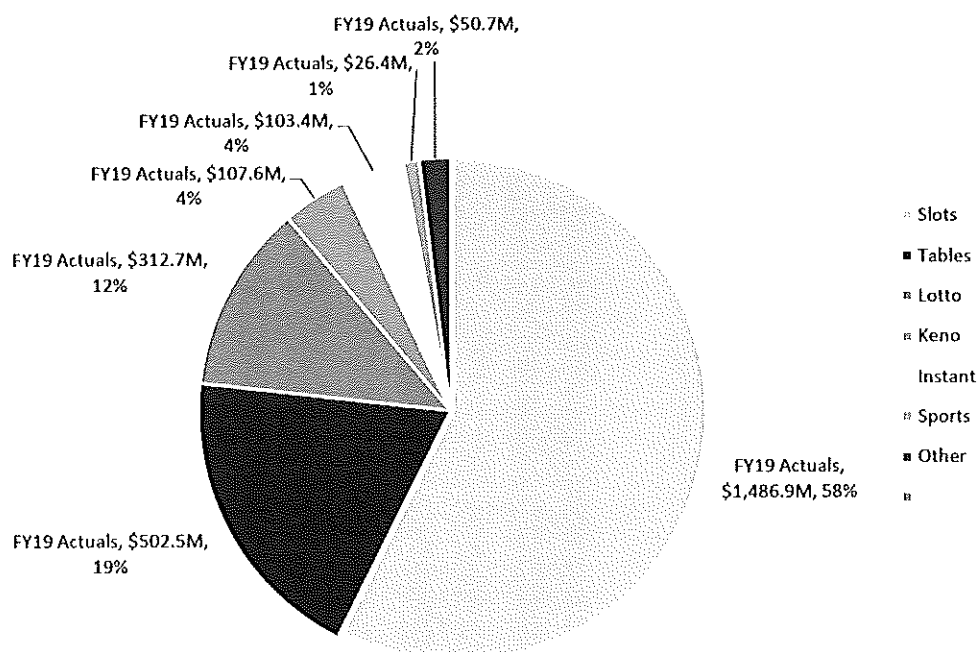
expected to return to historically normal levels after several years of above average number of high jackpots. In 2019/20, the gross margin percentage decrease reflects the annualization of the new OSA, implementation of a revised Lottery Retailer Agreement with an enhanced retail compensation structure (means to increase compliance with age-restriction policies and to invest in the retail partners' success) and normalized product mix.

For reference, below is the year over year variance commentary for historical revenue and gross margin:

In 2017/18, strong revenue results were achieved through critical operational execution of business strategies, especially around new content and the distribution of key product categories. Refining and introducing new games in our slot machines in casino formats, Scratch & Win games in retail lottery formats and casino-style games in eGaming format drove significant revenue growth and bucked the trend seen in other markets.

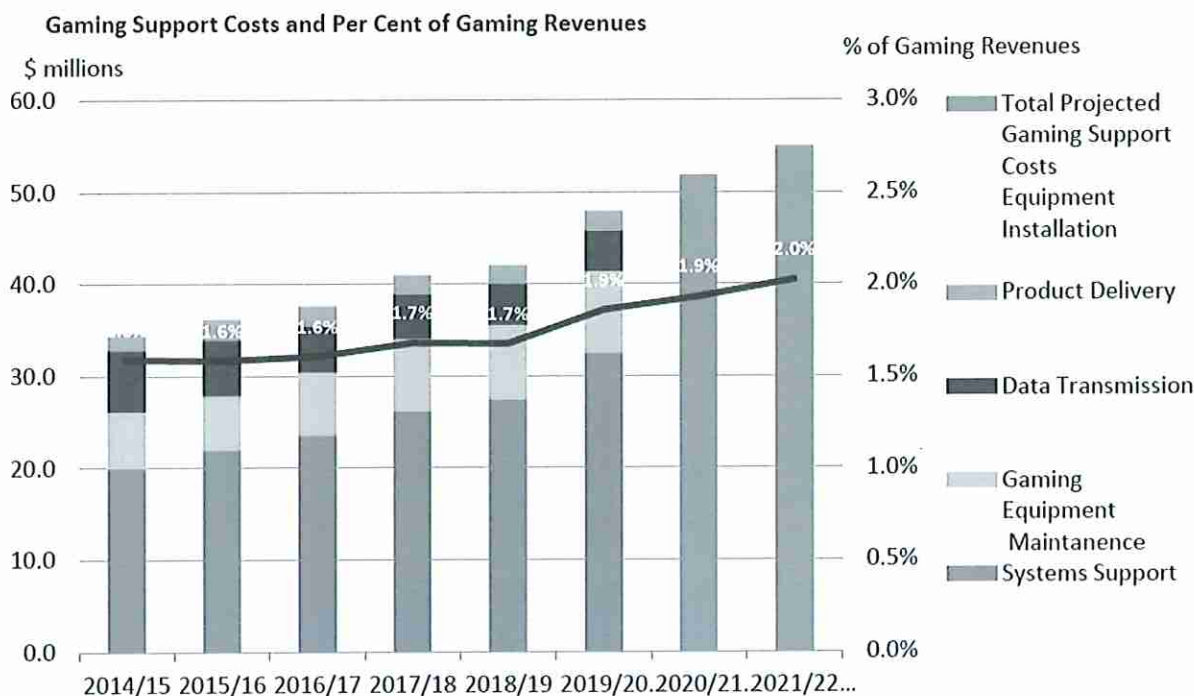
Revenue by Product 2018/19 Actuals

There is strong reliance on slots, table products and Big Lotto products (both in bricks and mortar and online channels), which represents almost 90 per cent of the total revenue in BCLC (57 per cent slots, 19 per cent tables, and 12 per cent Big Lotto).



GAMING SUPPORT COSTS

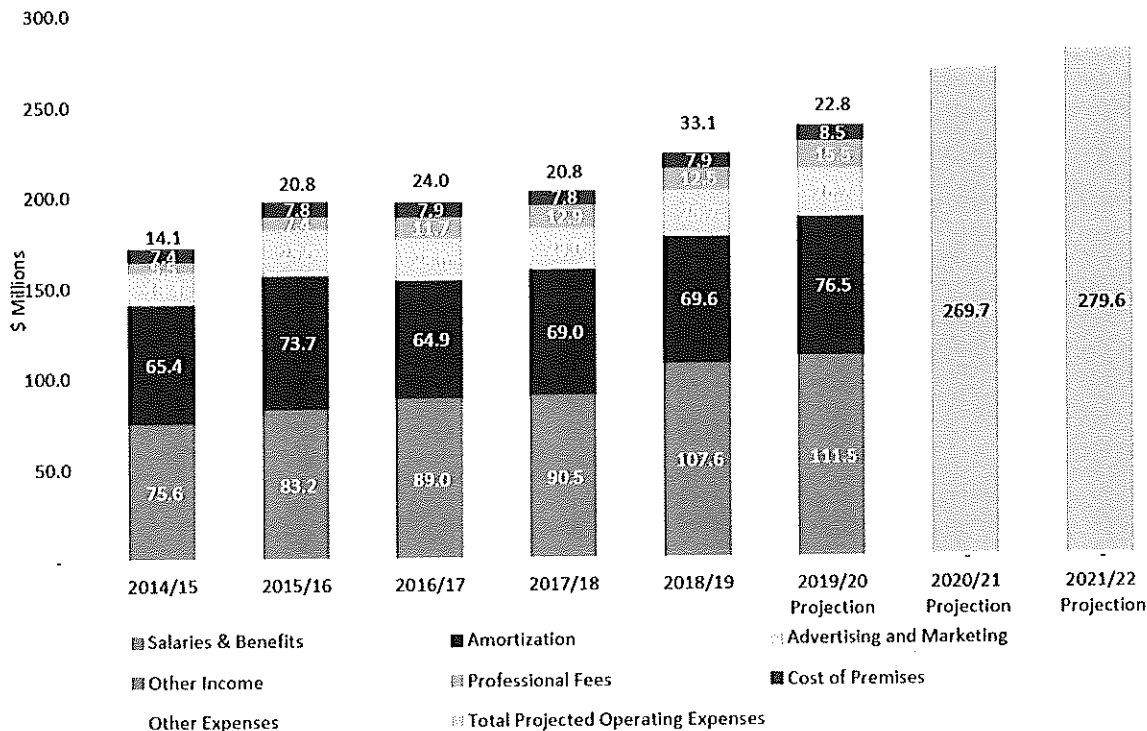
Gaming support costs are expenses that support revenue generation including systems support, data transmission, equipment installation, product delivery, sports odds-setting and internet-based software license and service fees. Gaming support costs are projected to increase as revenue increases and as BCLC continues to invest in technology.



OPERATING EXPENSES

The five largest categories in Operating Expenses are salaries and benefits, amortization, advertising and marketing, cost of premises and professional fees; these accounted for 87.1 per cent of Operating Expenses in 2018/19.

Operating Expenses by Category—Top Five Categories (\$ millions)



Salaries & Benefits

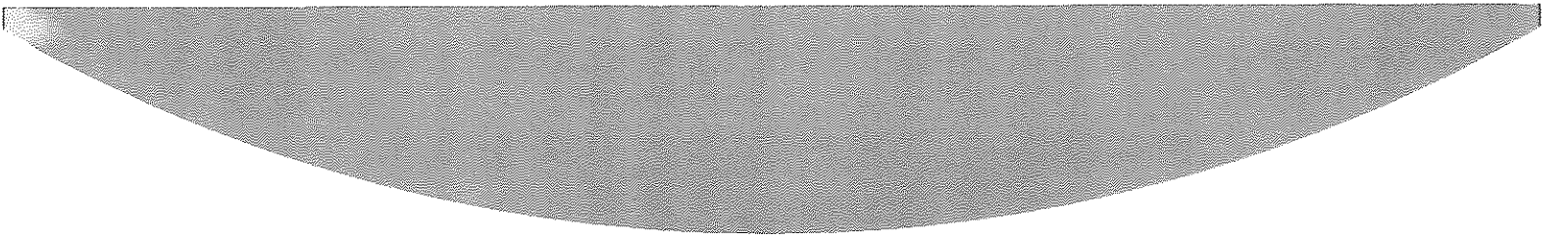
Salaries & Benefits steadily increased from 2014/15 to 2018/19 to support the growing corporate demands in the areas of compliance, regulatory, audit (including the requirements set by GPEB), and more recently to support player health and the Crown Review recommendation to replace key legacy systems. The increase in 2018/19 is primarily due to the migration and expansion of the Game Sense Advisors (GSAs) previously under GPEB into BCLC's workforce and the reclassification of contractor costs which were not considered firm or advisory services from professional fees. Salaries are expected to increase moving forward due to performance merit.

Amortization

Amortization is a function of investment decisions and timing of capital assets deployment. In 2016/17, there was a decline in amortization due to delays in asset deployments and changes in useful life of certain assets. Since 2016/17, amortization has increased and is projected to rise steadily into future years as a result of casino expansions and Lotto Transformation projects deployments.

Advertising and Marketing

In 2015/16, advertising and marketing spend increased to restore brand awareness and equity, to promote the increased Lotto Max jackpot cap and support high number of jackpot alerts (as result of record number of high jackpot offerings in both Lotto Max and Lotto 6/49 brands). In 2016/17, overall marketing spend normalized while



absorbing the new Daily Grand product launch. The increase in 2018/19 includes investments to promote the public's awareness of BCLC positive contributions to the community, digital initiatives and Lotto Max Game Enhancement. Marketing is expected to increase in 2019/20 to promote the launch of Lotto Max Game Enhancement.

Professional Fees

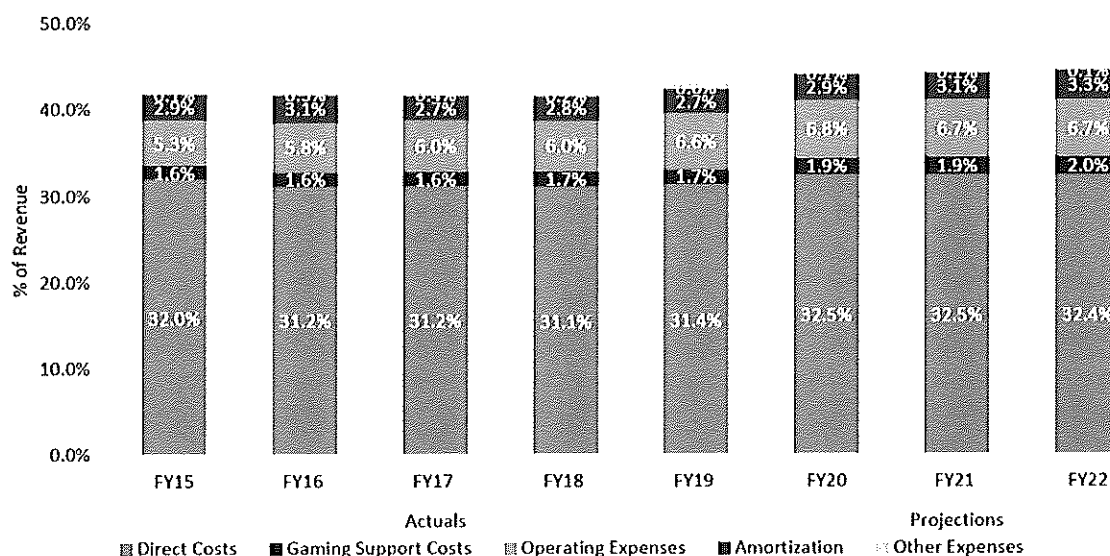
Professional fees are costs for professional services including management consulting, audit, legal fees and market research. Since 2014/15, professional fees and services have been increasing which is representative of contractors and consultants engaged to support new initiatives such as the re-negotiation of the Casino and Community Gaming Operating Service Agreements. Effective 2018/19, contractor costs were reclassified to salaries which resulted in an overall decrease in professional fees. The decrease was partially offset by an increase in consulting fees and building assessments related to identifying options for the aging head office in Kamloops. The lottery modernization and terminals projects are the drivers behind the expected increase in professional fees in 2019/20, primarily in management consulting.

Cost of Premises

Cost of premises include rent, repairs and maintenance, utilities and other facility operating costs. The general rise in costs for the past three years can be attributed to an increase in repairs and maintenance of our aging Kamloops headquarters.

Comprehensive Cost Ratio

The Comprehensive Cost Ratio (CCR) is the sum of direct, gaming support, operating, amortization and other costs (excluding interest and taxes) divided by net win (including non-gaming revenue) and expressed as a percentage. It is a cost ratio used to gauge operational efficiency. CCR is sensitive to product mix changes as direct costs represent majority of costs.

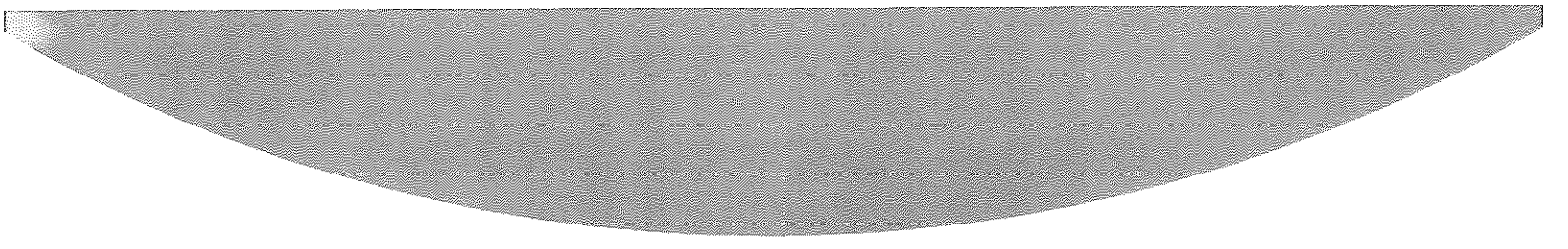


Direct expenses are driven by revenue on a product category basis which includes private sector service provider and retailer commissions, lottery ticket and bingo paper printing, and supplies. These expenses form the largest proportion of the company's Comprehensive Operating Costs (on average over the last five years make up 75 per cent of CCR). They are a function of revenue generation and the products which our players prefer to buy or play. Direct costs fluctuate and are sensitive to product mix primarily due to each product having a different commission rate.

In 2018/19, CCR reflects BCLC's transition to new OSA with a revised commission structure for casino and community gaming service providers (88 bps¹) which is partly offset by favourable product mix from higher Lottery and lower table revenue (-70bps). Increased operating expenses reflect investments into the long term health of the organization.

Increasing CCR in 2019/20 of 130 bps is primarily due to the implementation of a revised Lottery Retailer Agreement with an enhanced retail compensation structure for all of the lottery retailers (+50 bps), annualization of the new OSA (+20 bps), normalization of product mix (+30 bps) and continued investments into the long term health of the organization (+20bps).

1. ¹ Basis points are a unit of measure used in finance to describe the percentage change in the value or rate of a financial instrument. One basis point is equivalent to 0.01 per cent



Below is the commentary for historical CCR:

- CCR is relatively stable from 2014/15 to 2017/18. Changes in direct cost during these years are largely due to changing product mix. Direct costs dollars can increase due to volume but direct costs as a proportion of revenue can decline due to product mix if there is a higher mix of higher margin product and/or lower mix of lower margin product. Products have different commission rates associated with them.

Kevin Simcoe

From:
Sent:
To:
Subject:

message from
human resources

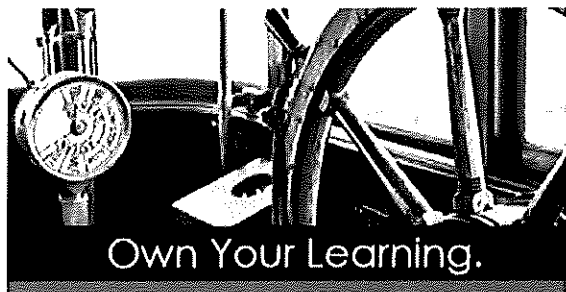
bclc
playing it right



BCLC Learning and Development July 2019

LinkedIn Learning

Thanks to everyone who dropped by the LinkedIn Learning booth at the Kamloops BCLC Committee Tradeshow. Here is a second chance to get into one of our contests. Information for the contests will also be available at the Vancouver BCLC Committee Tradeshow with a later deadline for the Vancouver folks:



Sign up for **LinkedIn Learning** for the first time,

OR

Watch the 3 minute video:

Volunteering from Marci Alboher,

OR

Watch the 4 minute video:

Self-care and Support from Britt Andreatta.

on **LinkedIn Learning** by July 5th and have a chance to win a \$50 Visa gift card.



Always Be Learning. **LEARNING**

**** If you have completed your Linked In Privacy Notification you can link directly to the recommended courses. If you still need to do this, [click here](#).**

Once you have completed the notice, it will take up to 30 minutes for the LinkedIn Learning tile to appear on your SuccessFactors Learning page.

Here is your menu of internal learning and development for July to September 2019.

Agile Mindset

Topic	Description	Session Date	Forma
<u>Work Smarter to Move Faster</u>	<ul style="list-style-type: none"> Come experience and learn about agile, lean, design thinking and the mindsets that will support a culture of progress, collaboration and customer focus. <p>Manager permission needed, however this course is highly recommended for all BCLC employees to participate in.</p> <p>Lunch provided.</p>	July and August dates available	Vanco Kamlo

Development Time

Topic	Description	Session Date	Forma
<u>Development and Career Conversations with Employees (for Managers)</u>	<ul style="list-style-type: none"> Come and learn how to support your employee's development and career planning while helping them build skill sets that benefit BCLC. 	July and August dates available	Vancoi Kamlo

This course is a half day and intended for People Managers.

<u>Have a Great Development Conversation with your Manager (for Employees)</u>	<ul style="list-style-type: none"> Come and learn how to prepare for and contribute to a great conversation with your manager about your development opportunities and career goals. 	August dates available	Vancoi Kamlo
--	---	------------------------	--------------

This is a 2 hour course from the employee perspective.

Open Enrollment

What is Open Enrollment? Open Enrollment is the ability for employees to sign themselves up for instructor-led Courses that are open to the entire organization. These courses can also be booked for teams as well.

Topic	Description	Session Date	Forma
<u>Speed of Trust – Open Enrollment</u>	<ul style="list-style-type: none"> Come and join our open enrollment session of Speed of Trust. This is a day long course that has been well received by BCLC employees in the past two years. Speed of Trust helps individuals become competent in using the framework, language, and behaviors that lead to high-trust teams and organizations. Intended Audience: Open to all employees. 	July 15 th 8:30am to 4:30pm	Vancoi

This course cost of \$160 will be charged to your department. You will need supervisor permission to attend.

Jennifer May

Senior Advisor, Employee Development, HR - Operations
BCLC, 74 Seymour St, Kamloops B.C. V2C 1E2
T 250 852 5409

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks. Enjoy a great weekend.

From: Rob Kroeker <RKroeker@bclc.com>
Sent: Friday, June 28, 2019 3:56 PM
To: Nicole Wu <NWu@BCLC.com>
Subject: Re: Spend Dynamics - P-card Approval

I will. Head home and have a super long weekend

See you Tuesday

R Kroeker

On Jun 28, 2019, at 3:07 PM, Nicole Wu <NWu@bclc.com> wrote:

Rob,
When time permits next week please go in Spend Dynamics to approve the expenses paid against my p-card for the food ordered at Earls on June 25, 2019.
Thank you!
Nicole
<NICOLE WU - LCS staff recognition event food order - June 25, 2019.pdf>

EARLS RESTAURANTS

Earls

3838 Lougheed Highway
Burnaby, BC
(604) 205-5025

Earls #10113 Bridge Park
3850 Lougheed Highway
Burnaby BC V6C 6H4
604-205-5025

RF TRANSACTION RECORD **
Trans. #1 24603
RUC: Lounge
Table #1 142
Check #1 4301
Group #1 2
Employee #1 337
Employee: Z-TYLHH

s 17(1)

Amount \$279.30
Tip \$47.88
=====

TOTAL CAD\$327.18

APPROVED 192057
00-001 (001) 192057
EA040819/EA040019
232001001009
08/26/2019 4:20:57 PM

TUR: 0000008000
TSI: E800

No signature required

Customer Copy

THANK YOU
Come again

349 TARALYN

Tbl 142/2 Chk 4301 Gst 1
25Jun'19 03:33PM

1 MARGHERIT PZ	15.00
1 MARGHERIT PZ	15.00
1 YAM FRIES	6.00
1 YAM FRIES	6.00
1 STREET TACOS	6.00
1 STREET TACOS	6.00
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1 BUFFALO CAULI	8.00
1 BUFFALO CAULI	8.00
1 BUFFALO CAULI	8.00
1 LOBSTER TOSTADA	8.00
1 LOBSTER TOSTADA	8.00
1 LOBSTER TOSTADA	8.00
1 LOBSTER TOSTADA	8.00
1 LOBSTER TOSTADA	8.00
1 LOBSTER TOSTADA	8.00
1 LOBSTER TOSTADA	8.00
1 DRY RIBS	8.00
1 DRY RIBS	8.00
1 DRY RIBS	8.00
1 DRY RIBS	8.00
1 DRY RIBS	8.00
1 DRY RIBS	8.00
1 DYNAMITE ROLL	10.00
1 DYNAMITE ROLL	10.00
1 DYNAMITE ROLL	10.00
1 DYNAMITE ROLL	10.00

Subtotal 266.00
GST Tax 13.30
04:19PM Total 279.30

Follow us on Instagram
@earlsbridgepark

Come join us for Happy Hour
Brunch on Saturday-Sunday
from 10:00am-12:00pm!

How did we do? Visit us at
www.earls.ca/feedback

GST # 87307 0445 RT0001

Kevin Simcoe

From:
Sent:
To:
Subject:

No problem Rob!

You get a weeks break from me...I'm working on trying to be more genuine. Hopefully you will see that on my return.

Try not to miss me too much☺

Happy Canada Day!

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

•Yes, and...•

bbamra@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Rob Kroeker <RKroeker@bclc.com>
Sent: June-28-19 8:34 AM
To: Bal Bamra <BBamra@BCLC.com>; Kevin deBruyckere <KdeBruyckere@bclc.com>
Subject: RE: STR Table

Bal

This is perfect. Really helps with context.

Thanks and have super long weekend.

Rob

From: Bal Bamra <BBamra@BCLC.com>
Sent: June-27-19 5:56 PM
To: Rob Kroeker <RKroeker@bclc.com>; Kevin deBruyckere <KdeBruyckere@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>
Subject: RE: STR Table

Hi Rob,

Does the attached work for you? We have included the table drop, slot drop and combined totals which would account for the casino revenue each month.

The data for 2013 and 2014 is still in progress.

Let me know.

Thanks,

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

•Yes, and...•

bbamra@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Rob Kroeker <RKroeker@bclc.com>
Sent: June-24-19 12:22 PM
To: Bal Bamra <BBamra@BCLC.com>; Kevin deBruyckere <KdeBruyckere@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>
Subject: RE: STR Table

Don't hate me, would it be much work to add a column with total casino revenue for each month as well? If that's a big task we can leave it for now. Again, not urgent.

From: Bal Bamra <BBamra@BCLC.com>
Sent: June-21-19 6:19 AM
To: Rob Kroeker <RKroeker@bclc.com>; Kevin deBruyckere <KdeBruyckere@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>
Subject: RE: STR Table

Morning,

Please find attached the spreadsheet to include the table drop for Jan 2015 to Dec 2019.

We will work on the 2013/14 years and update accordingly.

Thanks,

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

•Yes, and...•

bbamra@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Rob Kroeker <RKroeker@bclc.com>
Sent: June-20-19 1:19 PM

To: Bal Bamra <BBamra@BCLC.com>; Kevin deBruyckere <KdeBruyckere@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>
Subject: RE: STR Table

Thanks Bal. No rush, but if we can do 2013 and 2014 as time permits that would be great.

From: Bal Bamra <BBamra@BCLC.com>
Sent: June-20-19 12:01 PM
To: Rob Kroeker <RKroeker@bclc.com>; Kevin deBruyckere <KdeBruyckere@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>
Subject: RE: STR Table

Hi Rob,

Just to note, we don't have the information readily available pre 2015, this would require a manual count which we are working on, but that will take some time.

We can add the fourth column for table drop for the existing chart and that can be done shortly.

Thanks,

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

•Yes, and...•

bbamra@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Rob Kroeker <RKroeker@bclc.com>
Sent: June-20-19 11:54 AM
To: Kevin deBruyckere <KdeBruyckere@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>; Bal Bamra <BBamra@BCLC.com>
Subject: STR Table
Importance: Low

Hi

FOI did up the attached table from info you provided for an FOI request. In looking at this I am wondering if we could add a fourth column that had total table drop for each month as well? Also wondering if we could do the entire table from Jan 2013 or Jan 2014?

Not urgent at all. Any time would be fine.

Rob

Kevin Simcoe

From: RWang@BCLC.com
Sent:
To:

Maryschak
Cc:
Subject:
Attachments: w02_mon_day_after_report_weekly_report.pdf

Hi all,

Please see attached for the full report.

s 13(1), s 17(1), s 21

Notes:

1. This report contains unaudited data and is subject to change
2. Directional observations are valid but specific variance amounts may change

Please let me know if you have any questions or comments,

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:
Attachments:

Hi Rob,

The Statement of Financial Information as required under the Financial Information Act (the "FIA Report") will be published on BCLC.com near the end of September. One of the schedules in this report outlines the remuneration and expense totals (i.e. not the details attached) for all employees earning remuneration greater than \$75,000. The release of this report often prompts Freedom of Information ("FOI") requests that require us to release details of expenses. As executive staff is commonly the subject of FOI requests, we would like to provide clarity around the details of your expenses for your information (note: there is no current FOI request for this information).

To clarify the requirements of the FIA Report, we are required to report:

- Expenses paid in the fiscal year (i.e. the date of payment not the date of travel)
- Expenses paid directly to or on behalf of employees (i.e. paid through travel management, purchase card, or accounts payable)
- Expenses that are generally perceived as perquisites, or bestowing personal benefit, and also may include expenditures required for employees to perform their job functions (i.e. most expenses with the exception expenses of a general nature)
- The total of expenses only (i.e. not the detail provided in the attached PDF)

Please refer to the attached PDF for details of your expenses and reply back with confirmation of your review on or before July 12, 2019. Please also let me know if there are any expenses that appear to be missing from the attached listing.

If you have any questions do not hesitate to contact me.

Best regards,

Callie Leonard, CPA, CGA
Manager, Financial Reporting & Systems
Finance & Corporate Services, BCLC

74 West Seymour Street, Kamloops, B.C. V2C 1E2

T 250 828 5523 F 800-637-0746
cleonard@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

FY2019 FIA Details of Expenses

Expenses paid through travel management

Pers.No.	S 22	Empl./Appl.Name	Trip	Reason for Trip	Total Cost	Name of Expense Type	Loc.curt.amt	Date
* Total								
		Robert Kroeker	1000044362			Airfare	36.75	
		Robert Kroeker	1000044362			Airfare	661.76	
			1000044362	BCLC Milestone Anniversary Luncheon April 5	698.51			
		Robert Kroeker	1000044511			Gas/Repairs/Insurance - No PHH	5.38	5/04/18
		Robert Kroeker	1000044511			Parking, Tolls	30.00	5/04/18
		Robert Kroeker	1000044511			Parking, Tolls	5.00	3/04/18
		Robert Kroeker	1000044511			Parking, Tolls	5.00	03/28/2018
		Robert Kroeker	1000044511			Parking, Tolls	16.00	03/28/2018
		Robert Kroeker	1000044511			Parking, Tolls	16.00	03/28/2018
		Robert Kroeker	1000044511			Parking, Tolls	16.00	03/28/2018
		Robert Kroeker	1000044511			Car Rental	44.57	5/04/18
* Total			1000044511	Director College Training/Parq Tour/Milestone luncheon	137.95			
		Robert Kroeker	1000044685			Dinner Allowance	30.00	04/19/2018
		Robert Kroeker	1000044685			Dinner Allowance	30.00	04/18/2018
		Robert Kroeker	1000044685			Dinner Allowance	30.00	04/17/2018
		Robert Kroeker	1000044685			Hotel	121.80	04/18/2018
		Robert Kroeker	1000044685			Hotel	121.80	04/17/2018
		Robert Kroeker	1000044685			Incidental Allowance	12.25	04/18/2018
		Robert Kroeker	1000044685			Incidental Allowance	12.25	04/17/2018
		Robert Kroeker	1000044685			Lunch Allowance	15.00	04/19/2018
* Total			1000044685	LCS Management Team Mtg Apr 17/Exec Mtg Apr 18-19	373.10			
		Robert Kroeker	1000044726			Dinner Allowance	30.00	04/23/2018
		Robert Kroeker	1000044726			Gas/Repairs/Insurance - No PHH	3.79	04/23/2018
		Robert Kroeker	1000044726			Lunch Allowance	15.00	04/23/2018
		Robert Kroeker	1000044726			Parking, Tolls	30.00	04/23/2018
		Robert Kroeker	1000044726			Car Rental	44.57	04/23/2018
* Total			1000044726	KPMG Meeting/Security Meeting	123.36			
		Robert Kroeker	1000044797			Airfare	36.75	04/26/2018
		Robert Kroeker	1000044797			Airfare	625.01	04/26/2018
		Robert Kroeker	1000044797			Airfare	36.75	04/26/2018
		Robert Kroeker	1000044797			Airfare	615.56	04/26/2018
		Robert Kroeker	1000044797			Airfare	36.75	04/26/2018
		Robert Kroeker	1000044797			Airfare	625.01	04/26/2018
		Robert Kroeker	1000044797			Business Meeting	22.82	04/26/2018
* Total			1000044797	GPEB Meeting/Business trips to Kamloops (May)	1,998.65			
		Robert Kroeker	1000044852			Ferries	72.50	3/05/18
		Robert Kroeker	1000044852			Ferries	89.50	3/05/18
		Robert Kroeker	1000044852			Parking, Tolls	10.00	3/05/18
* Total			1000044852	AML Meeting/May 3	172.00			
		Robert Kroeker	1000044983			Dinner Allowance	30.00	05/14/2018
		Robert Kroeker	1000044983			Dinner Allowance	30.00	05/15/2018
		Robert Kroeker	1000044983			Gas/Repairs/Insurance - No PHH	3.44	05/15/2018
		Robert Kroeker	1000044983			Hotel	121.80	05/14/2018
		Robert Kroeker	1000044983			Incidental Allowance	12.25	05/14/2018
		Robert Kroeker	1000044983			Parking, Tolls	60.00	05/15/2018
		Robert Kroeker	1000044983			Car Rental	42.78	05/15/2018
* Total			1000044983	BoD Meeting on May 15	300.27			
		Robert Kroeker	1000045027			Airfare	36.75	05/18/2018

Robert Kroeker	1000045614		Airfare	371.95	06/28/2018
Robert Kroeker	1000045614		Airfare	36.75	06/28/2018
Robert Kroeker	1000045614		Airfare	894.76	06/28/2018
Robert Kroeker	1000045614		Parking, Tolls	10.00	06/28/2018
* Total	1000045614	GPEB Regulator Training/OLG Mtg/KAM Security Mtg & Board Meeting on July 12-13		1,801.98	
Robert Kroeker	1000045679		Lunch Allowance	15.00	3/07/18
Robert Kroeker	1000045679		Parking, Tolls	4.00	6/07/18
* Total	1000045679	Meeting w. GPEB on Jul 3 & Meeting w. FinTRAC on Jul 6		19.00	
Robert Kroeker	1000045737		Breakfast Allowance	10.00	07/13/2018
Robert Kroeker	1000045737		Dinner Allowance	30.00	07/13/2018
Robert Kroeker	1000045737		Hotel	351.38	12/07/18
Robert Kroeker	1000045737		Incidental Allowance	12.25	12/07/18
Robert Kroeker	1000045737		Lunch Allowance	15.00	12/07/18
Robert Kroeker	1000045737		Lunch Allowance	15.00	07/13/2018
Robert Kroeker	1000045737		Business Meeting	67.11	12/07/18
Robert Kroeker	1000045737		Parking, Tolls	60.00	07/13/2018
* Total	1000045737	OLG Meeting on July 12-13		560.74	
Robert Kroeker	1000045743		Airfare	52.50	07/17/2018
Robert Kroeker	1000045743		Airfare	26.25	07/17/2018
* Total	1000045743	Minister Meeting on July 25		78.75	
Robert Kroeker	1000045760		Parking, Tolls	59.52	07/19/2018
Robert Kroeker	1000045760		Parking, Tolls	59.52	07/19/2018
* Total	1000045760	Highway Toll for rental car used on June 19/22		59.52	
Robert Kroeker	1000045775		Airfare	643.65	07/19/2018
Robert Kroeker	1000045775		Airfare	36.75	07/19/2018
Robert Kroeker	1000045775		Airfare	433.91	07/19/2018
Robert Kroeker	1000045775		Airfare	36.75	07/19/2018
* Total	1000045775	Attend ACM LTF Working Group Mtg Aug 21/Exec mtg Aug 22		1,151.06	
Robert Kroeker	1000045965		Breakfast Allowance	10.00	07/24/2018
Robert Kroeker	1000045965		Dinner Allowance	30.00	07/23/2018
Robert Kroeker	1000045965		Gas/Repairs/Insurance - No PHH	4.75	07/24/2018
Robert Kroeker	1000045965		Hotel	194.13	07/23/2018
Robert Kroeker	1000045965		Incidental Allowance	12.25	07/23/2018
Robert Kroeker	1000045965		Parking, Tolls	22.00	07/20/2018
Robert Kroeker	1000045965		Parking, Tolls	30.00	07/24/2018
Robert Kroeker	1000045965		Car Rental	42.78	07/24/2018
* Total	1000045965	Medisys Jul 20/LCS Staff Engagement Jul 23-24		345.91	
Robert Kroeker	1000045966		Breakfast Allowance	10.00	07/26/2018
Robert Kroeker	1000045966		Dinner Allowance	30.00	07/25/2018
Robert Kroeker	1000045966		Gas/Repairs/Insurance - No PHH	2.18	07/26/2018
Robert Kroeker	1000045966		Hotel	217.09	07/25/2018
Robert Kroeker	1000045966		Incidental Allowance	12.25	07/25/2018
Robert Kroeker	1000045966		Lunch Allowance	15.00	07/25/2018
Robert Kroeker	1000045966		Parking, Tolls	60.00	07/26/2018
Robert Kroeker	1000045966		Car Rental	83.36	07/26/2018
* Total	1000045966	Minister Mtg Jul 25 and Board Mtg Jul 26		429.88	
Robert Kroeker	1000045967		Airfare	36.75	3/08/18
Robert Kroeker	1000045967		Airfare	542.31	3/08/18
Robert Kroeker	1000045967		Parking, Tolls	4.00	3/08/18
Robert Kroeker	1000045967		Parking, Tolls	25.00	3/08/18
Robert Kroeker	1000045967		Parking, Tolls	4.10	07/31/2018
* Total	1000045967	Business meetings Jul 31-Aug 5/Every Meeting Aug 22-23		\$12.16	

* Total	Robert Kroeker	1000045991	SLT Mtg Sept 5-6/Pre G2E Sept 24-26/ACAMS Oct 3-5	Airfare	36.70	08/15/2018
	Robert Kroeker	1000045991		Airfare	616.73	08/15/2018
	Robert Kroeker	1000045991		Airfare	36.75	08/15/2018
	Robert Kroeker	1000045991		Airfare	620.10	08/15/2018
	Robert Kroeker	1000045991		Airfare	36.75	08/15/2018
	Robert Kroeker	1000045991		Airfare	559.91	08/15/2018
* Total		1000045991	ACMLTF Legs & Regs Working Group Mtg Aug 20-21		1,906.94	
	Robert Kroeker	1000046048		Breakfast Allowance	10.00	08/21/2018
	Robert Kroeker	1000046048		Dinner Allowance	30.00	08/20/2018
	Robert Kroeker	1000046048		Dinner Allowance	30.00	08/21/2018
	Robert Kroeker	1000046048		Hotel	423.07	08/20/2018
	Robert Kroeker	1000046048		Incidental Allowance	12.25	08/20/2018
	Robert Kroeker	1000046048		Lunch Allowance	15.00	08/20/2018
	Robert Kroeker	1000046048		Parking, Tolls	60.00	08/21/2018
	Robert Kroeker	1000046048		Parking, Tolls	5.00	08/21/2018
	Robert Kroeker	1000046048		Taxi, Bus	38.00	08/20/2018
	Robert Kroeker	1000046048		Taxi, Bus	40.00	08/21/2018
		1000046048			663.32	
	Robert Kroeker	1000046049		Breakfast Allowance	10.00	08/23/2018
	Robert Kroeker	1000046049		Breakfast Allowance	10.00	08/22/2018
* Total	Robert Kroeker	1000046049	Everi Meeting Aug 22-23	Hotel	155.91	08/22/2018
	Robert Kroeker	1000046049		Incidental Allowance	12.25	08/22/2018
	Robert Kroeker	1000046049		Parking, Tolls	60.00	08/23/2018
		1000046049			248.16	
	Robert Kroeker	1000046123		Dinner Allowance	30.00	08/27/2018
	Robert Kroeker	1000046123		Dinner Allowance	30.00	08/28/2018
	Robert Kroeker	1000046123		Dinner Allowance	30.00	08/29/2018
	Robert Kroeker	1000046123		Gas/Repairs/Insurance - No PHH	6.49	08/30/2018
	Robert Kroeker	1000046123		Hotel	121.80	08/27/2018
	Robert Kroeker	1000046123		Hotel	121.80	08/28/2018
	Robert Kroeker	1000046123		Incidental Allowance	12.25	08/27/2018
	Robert Kroeker	1000046123		Incidental Allowance	12.25	08/28/2018
	Robert Kroeker	1000046123		Incidental Allowance	12.25	08/29/2018
	Robert Kroeker	1000046123		Parking, Tolls	90.00	08/30/2018
* Total	Robert Kroeker	1000046123	Executive Meetings Aug 28-30	Car Rental	132.04	08/30/2018
		1000046123			720.68	
	Robert Kroeker	1000046222		Breakfast Allowance	10.00	5/09/18
	Robert Kroeker	1000046222		Dinner Allowance	30.00	4/09/18
	Robert Kroeker	1000046222		Gas/Repairs/Insurance - No PHH	6.01	6/09/18
	Robert Kroeker	1000046222		Hotel	133.40	4/09/18
	Robert Kroeker	1000046222		Hotel	133.40	5/09/18
	Robert Kroeker	1000046222		Incidental Allowance	12.25	4/09/18
	Robert Kroeker	1000046222		Incidental Allowance	12.25	5/09/18
	Robert Kroeker	1000046222		Parking, Tolls	9.45	4/09/18
	Robert Kroeker	1000046222		Parking, Tolls	68.00	6/09/18
	Robert Kroeker	1000046222		Parking, Tolls	11.00	7/09/18
	Robert Kroeker	1000046222		Car Rental	88.03	6/09/18
		1000046222			513.79	
* Total	Robert Kroeker	1000046238	SLT Meeting Sept 5-6/Business Mtg Sept 7	Airfare	36.75	11/09/18
	Robert Kroeker	1000046238		Airfare	433.91	11/09/18

* Total		Security meetings/Business Meetings on October 30	470.66	
	Robert Kroeker	1000046238	Dinner Allowance	30.00
	Robert Kroeker	1000046278	Hotel	201.84
	Robert Kroeker	1000046278	Incidental Allowance	12.25
	Robert Kroeker	1000046278	Business Meeting	18.79
* Total		LCS Management Team Meeting Sept 12-13	262.88	
	Robert Kroeker	1000046278	Airfare	328.00
	Robert Kroeker	1000046356	Parking, Tolls	2.00
	Robert Kroeker	1000046356	Parking, Tolls	12.00
* Total		Chastity Davis Workshop Sept 17-18/DM Committee Mtg S	342.00	
	Robert Kroeker	1000046356	Dinner Allowance	30.00
	Robert Kroeker	1000046409	Hotel	412.96
	Robert Kroeker	1000046409	Hotel	413.57
	Robert Kroeker	1000046409	Hotel	413.99
	Robert Kroeker	1000046409	Incidental Allowance	12.25
	Robert Kroeker	1000046409	Incidental Allowance	12.25
	Robert Kroeker	1000046409	Incidental Allowance	12.25
	Robert Kroeker	1000046409	Lunch Allowance	15.00
	Robert Kroeker	1000046409	Meal (Receipt Required)	37.50
	Robert Kroeker	1000046409	Meal (Receipt Required)	12.50
	Robert Kroeker	1000046409	Meal (Receipt Required)	12.50
	Robert Kroeker	1000046409	Meal (Receipt Required)	37.50
	Robert Kroeker	1000046409	Meal (Receipt Required)	12.50
	Robert Kroeker	1000046409	Parking, Tolls	86.04
	Robert Kroeker	1000046409	Taxi, Bus	30.83
	Robert Kroeker	1000046409	Taxi, Bus	27.27
* Total		Pre-GZE Sept 24 - 26	1,578.91	
	Robert Kroeker	1000046409	Hotel	369.12
	Robert Kroeker	1000046529	Hotel	369.55
	Robert Kroeker	1000046529	Hotel	313.01
	Robert Kroeker	1000046529	Incidental Allowance	12.25
	Robert Kroeker	1000046529	Incidental Allowance	12.25
	Robert Kroeker	1000046529	Incidental Allowance	12.25
	Robert Kroeker	1000046529	Lunch Allowance	15.00
	Robert Kroeker	1000046529	Meal (Receipt Required)	18.75
	Robert Kroeker	1000046529	Meal (Receipt Required)	37.50
	Robert Kroeker	1000046529	Meal (Receipt Required)	18.75
	Robert Kroeker	1000046529	Meal (Receipt Required)	18.75
	Robert Kroeker	1000046529	Meal (Receipt Required)	12.50
	Robert Kroeker	1000046529	Parking, Tolls	86.07
	Robert Kroeker	1000046529	Taxi, Bus	37.54
	Robert Kroeker	1000046529	Taxi, Bus	30.06
* Total		ACAMS conference on Oct 3 - 5	1,363.35	
	Robert Kroeker	1000046529	Business Meeting	52.95
	Robert Kroeker	1000046550	Parking, Tolls	3.00
* Total		SP Compliance Meeting	55.95	
	Robert Kroeker	1000046550	Parking, Tolls	7.85
	Robert Kroeker	1000046688	Parking, Tolls	16.35
	Robert Kroeker	1000046688	Parking, Tolls	22.35
	Robert Kroeker	1000046688	Parking, Tolls	17.80
* Total		Business meetings on Oct 15 - 17/Oct 19	64.15	

Robert Kroeker	1000046828	Dinner Allowance	30.00	10/29/2018
Robert Kroeker	1000046828	Dinner Allowance	30.00	10/30/2018
Robert Kroeker	1000046828	Gas/Repairs/Insurance - No PHH	4.33	10/30/2018
Robert Kroeker	1000046828	Hotel	121.80	10/29/2018
Robert Kroeker	1000046828	Incidental Allowance	12.25	10/29/2018
Robert Kroeker	1000046828	Lunch Allowance	15.00	10/30/2018
Robert Kroeker	1000046828	Parking, Tolls	62.50	10/30/2018
Robert Kroeker	1000046828	Parking, Tolls	5.00	10/30/2018
Robert Kroeker	1000046828	Car Rental	44.01	10/30/2018
* Total	1000046828	Security meetings/Business Meetings on October 30	324.89	
Robert Kroeker	1000046849	Airfare	36.75	1/11/18
Robert Kroeker	1000046849	Airfare	429.71	1/11/18
Robert Kroeker	1000046849	Airfare	36.75	1/11/18
Robert Kroeker	1000046849	Airfare	1,574.74	1/11/18
* Total	1000046849	ACMLTF Mtg/OLG Mtg/LQ Mtg Nov 19-23 & Security Mtgs	2,077.95	
Robert Kroeker	1000047110	Breakfast Allowance	10.00	11/23/2018
Robert Kroeker	1000047110	Breakfast Allowance	10.00	11/22/2018
Robert Kroeker	1000047110	Breakfast Allowance	10.00	11/20/2018
Robert Kroeker	1000047110	Dinner Allowance	30.00	11/21/2018
Robert Kroeker	1000047110	Dinner Allowance	30.00	11/20/2018
Robert Kroeker	1000047110	Dinner Allowance	30.00	11/19/2018
Robert Kroeker	1000047110	Hotel	228.48	11/22/2018
Robert Kroeker	1000047110	Hotel	304.38	11/21/2018
Robert Kroeker	1000047110	Hotel	304.38	11/20/2018
Robert Kroeker	1000047110	Hotel	233.86	11/19/2018
Robert Kroeker	1000047110	Incidental Allowance	12.25	11/22/2018
Robert Kroeker	1000047110	Incidental Allowance	12.25	11/21/2018
Robert Kroeker	1000047110	Incidental Allowance	12.25	11/20/2018
Robert Kroeker	1000047110	Incidental Allowance	12.25	11/19/2018
Robert Kroeker	1000047110	Lunch Allowance	15.00	11/19/2018
Robert Kroeker	1000047110	Lunch Allowance	15.00	11/20/2018
Robert Kroeker	1000047110	Lunch Allowance	15.00	11/21/2018
Robert Kroeker	1000047110	Lunch Allowance	15.00	11/22/2018
Robert Kroeker	1000047110	Lunch Allowance	15.00	11/23/2018
Robert Kroeker	1000047110	Business Meeting	98.72	11/21/2018
Robert Kroeker	1000047110	Business Meeting	50.46	11/23/2018
Robert Kroeker	1000047110	Parking, Tolls	86.07	11/23/2018
Robert Kroeker	1000047110	Parking, Tolls	2.75	11/23/2018
Robert Kroeker	1000047110	Taxi, Bus	38.53	11/19/2018
Robert Kroeker	1000047110	Taxi, Bus	41.00	11/20/2018
Robert Kroeker	1000047110	Taxi, Bus	66.00	11/20/2018
* Total	1000047110	ACMLTF Mtg/OLG Mtg/LQ Mtg Nov 19-23	1,698.53	
Robert Kroeker	1000047124	Airfare	492.71	11/17/2018
Robert Kroeker	1000047124	Airfare	36.75	11/17/2018
* Total	1000047124	Executive Meeting/Security Meetings Dec 18 - 19	529.46	
Robert Kroeker	1000047136	Dinner Allowance	30.00	11/27/2018
Robert Kroeker	1000047136	Dinner Allowance	30.00	11/26/2018
Robert Kroeker	1000047136	Gas/Repairs/Insurance - No PHH	2.82	11/27/2018
Robert Kroeker	1000047136	Hotel	121.80	11/26/2018
Robert Kroeker	1000047136	Incidental Allowance	12.25	11/26/2018
Robert Kroeker	1000047136	Lunch Allowance	15.00	11/27/2018

* Total	Robert Kroeker	1000047136			Parking, Tolls	68.00	11/27/2018
	Robert Kroeker	1000047136			Parking, Tolls	3.00	11/27/2018
	Robert Kroeker	1000047136			Car Rental	47.47	11/27/2018
		1000047136	Security meetings on Nov 27			330.34	
	Robert Kroeker	1000047436			Dinner Allowance	30.00	12/17/2018
	Robert Kroeker	1000047436			Gas/Repairs/Insurance - No PHH	5.41	12/19/2018
	Robert Kroeker	1000047436			Hotel	121.80	12/18/2018
	Robert Kroeker	1000047436			Hotel	121.80	12/17/2018
	Robert Kroeker	1000047436			Incidental Allowance	12.25	12/18/2018
	Robert Kroeker	1000047436			Incidental Allowance	12.25	12/17/2018
	Robert Kroeker	1000047436			Lunch Allowance	15.00	12/19/2018
	Robert Kroeker	1000047436			Parking, Tolls	6.00	12/19/2018
	Robert Kroeker	1000047436			Parking, Tolls	6.48	12/19/2018
	Robert Kroeker	1000047436			Parking, Tolls	68.00	12/19/2018
	Robert Kroeker	1000047436			Car Rental	166.11	12/19/2018
		1000047436	Exec meeting on Dec 18-19			565.10	
	Robert Kroeker	1000047482			Airfare	438.11	12/28/2018
	Robert Kroeker	1000047482			Airfare	36.75	12/28/2018
* Total		1000047482	Business meetings on January 22			474.86	
		1000047606			Conference fees	2,367.35	01/15/2019
	Robert Kroeker	1000047606	Conference registration for 18th AML & Finance Crime Fo				
	Robert Kroeker	1000047655			Airfare	325.00	01/18/2019
	Robert Kroeker	1000047655			Airfare	325.00	01/18/2019
	Robert Kroeker	1000047655			Parking, Tolls	6.00	01/18/2019
	Robert Kroeker	1000047655			Parking, Tolls	2.00	01/18/2019
	Robert Kroeker	1000047655			Parking, Tolls	2.00	01/18/2019
	Robert Kroeker	1000047655			Taxi, Bus	11.00	01/18/2019
	Robert Kroeker	1000047655			Taxi, Bus	11.00	01/18/2019
		1000047655	Compliance Meeting with GPEB (Sam MacLeod) on Jan 18			682.00	
	Robert Kroeker	1000047685			Dinner Allowance	30.00	01/22/2019
	Robert Kroeker	1000047685			Gas/Repairs/Insurance - No PHH	4.55	01/22/2019
	Robert Kroeker	1000047685			Business Meeting	38.23	01/22/2019
	Robert Kroeker	1000047685			Parking, Tolls	2.00	01/21/2019
	Robert Kroeker	1000047685			Parking, Tolls	34.00	01/22/2019
	Robert Kroeker	1000047685			Parking, Tolls	14.75	01/23/2019
	Robert Kroeker	1000047685			Car Rental	80.93	01/22/2019
		1000047685	Business meetings on Jan 21 - 23			204.46	
	Robert Kroeker	1000047817			Airfare	445.46	4/02/19
	Robert Kroeker	1000047817			Airfare	36.75	4/02/19
	Robert Kroeker	1000047817			Airfare	105.00	4/02/19
	Robert Kroeker	1000047817			Airfare	26.25	4/02/19
	Robert Kroeker	1000047817			Airfare	505.31	4/02/19
	Robert Kroeker	1000047817			Airfare	36.75	4/02/19
	Robert Kroeker	1000047817			Airfare	349.91	4/02/19
	Robert Kroeker	1000047817			Airfare	36.75	4/02/19
	Robert Kroeker	1000047817			Ferries	91.70	4/02/19
	Robert Kroeker	1000047817			Ferries	74.70	4/02/19
	Robert Kroeker	1000047817			Business Meeting	29.46	4/02/19
	Robert Kroeker	1000047817			Parking, Tolls	2.25	4/02/19
	Robert Kroeker	1000047817			Parking, Tolls	18.00	4/02/19
* Total		1000047817	Business meetings/Director College Exam/Exec Meetings			1,755.29	

Robert Kroeker	1000047967		Airfare	523.16	02/22/2019
Robert Kroeker	1000047967		Airfare	36.75	02/22/2019
* Total	1000047967	Meeting with Minister	\$59.91		
Robert Kroeker	1000047971		Dinner Allowance	30.00	02/20/2019
Robert Kroeker	1000047971		Dinner Allowance	30.00	02/21/2019
Robert Kroeker	1000047971		Gas/Repairs/Insurance - No PHH	4.49	02/21/2019
Robert Kroeker	1000047971		Hotel	113.68	02/20/2019
Robert Kroeker	1000047971		Incidental Allowance	12.25	02/20/2019
Robert Kroeker	1000047971		Lunch Allowance	15.00	02/20/2019
Robert Kroeker	1000047971		Parking, Tolls	51.71	02/21/2019
Robert Kroeker	1000047971		Car Rental	166.11	02/21/2019
* Total	1000047971	Security meetings and company milestone lunch	423.24		
Robert Kroeker	1000048025		Memberships	414.75	02/27/2019
* Total	1000048025	Membership (Institute of Corporate Directors)	414.75		
Robert Kroeker	1000048078		Breakfast Allowance	10.00	02/28/2019
Robert Kroeker	1000048078		Lunch Allowance	15.00	02/28/2019
Robert Kroeker	1000048078		Parking, Tolls	5.00	1/03/19
Robert Kroeker	1000048078		Parking, Tolls	7.00	1/03/19
Robert Kroeker	1000048078		Parking, Tolls	17.60	02/28/2019
Robert Kroeker	1000048078		Parking, Tolls	34.00	02/28/2019
* Total	1000048078	Mtg with Minister Eby/Employee Milestone Lunch/SP Mtg	88.60		
Robert Kroeker	1000048171		Airfare	363.56	11/03/19
Robert Kroeker	1000048171		Airfare	36.75	11/03/19
Robert Kroeker	1000048171		Parking, Tolls	6.35	11/03/19
Robert Kroeker	1000048171		Parking, Tolls	32.00	11/03/19
* Total	1000048171	Security meetings and business meetings	438.66		
Robert Kroeker	1000048206		Airfare	26.25	03/15/2019
Robert Kroeker	1000048206		Airfare	229.95	03/15/2019
* Total	1000048206	Exec meeting on March 20	256.20		
Robert Kroeker	1000048263		Airfare	36.75	03/14/2019
Robert Kroeker	1000048263		Airfare	499.01	03/14/2019
* Total	1000048263	LCS Bi-annual Manager Workshop April 1-2	535.76		
Robert Kroeker	1000048345		Breakfast Allowance	10.00	03/19/2019
Robert Kroeker	1000048345		Breakfast Allowance	10.00	03/20/2019
Robert Kroeker	1000048345		Dinner Allowance	30.00	03/20/2019
Robert Kroeker	1000048345		Gas/Repairs/Insurance - No PHH	2.86	03/20/2019
Robert Kroeker	1000048345		Parking, Tolls	14.50	03/19/2019
Robert Kroeker	1000048345		Parking, Tolls	34.00	03/19/2019
Robert Kroeker	1000048345		Parking, Tolls	34.00	03/20/2019
Robert Kroeker	1000048345		Parking, Tolls	20.00	03/20/2019
Robert Kroeker	1000048345		Parking, Tolls	5.00	03/20/2019
Robert Kroeker	1000048345		Car Rental	63.63	03/19/2019
Robert Kroeker	1000048345		Car Rental	47.47	03/20/2019
* Total	1000048345	BCLC/GPEB Joint Executive Meeting Mar 19	271.46		
Total expenses paid through travel management			\$ 33,062.50		

Expenses paid through Accounts Payable

Name	Pers. No.	Fiscal Period	Description	Amount allocated	# of attendees
Robert Kroeker	S 22	1	LexisNexis eStore - A Guide to Canadian Money Laundering Legislation	\$ 138.86	1
Robert Kroeker		2	Gspc Inv 18062022-30 - 2018 GSPC Annual General Meeting	\$ 200.00	1
Robert Kroeker		3	ACAMS Inv 000436076 VCR Chapter membership \$1450.00 US	\$ 64.96	29
Robert Kroeker		3	ACAMS Inv 000439270 - AML & Financial Crime Conference \$14,355.00 US	\$ 2,069.03	9
Robert Kroeker		1	Sauder School of Business Inv LKSD-15MAR18 - Director's College Governance Program	\$ 4,290.24	9
Robert Kroeker		6	Sauder School of Business Inv LKSD-08JUN18 - Director's College Governance Program	\$ 5,297.95	9
Robert Kroeker		10	Sauder School of Business Inv LKSD-17OCT18 - Director's College Governance Program	\$ 6,173.45	9
Robert Kroeker		4	Manning Park Resort - LCS Managers workshop Apr 17-18/18	\$ 27.73	16
Robert Kroeker		6	Richard Hazelman Inv 457 Diversity & Inclusion Leadership workshop	\$ 69.00	11
Robert Kroeker		6	Susan Dolinski - Reimbursement Diversity & Inclusion debrief (Floata Seafood Restaurant)	\$ 27.08	12
Robert Kroeker		8	Chastity Davis Consulting Inv 001 Diversity & Inclusion Leadership workshop	\$ 3,266.67	9
Robert Kroeker		6	Harrison Hot Springs Resort - Meeting Sep 12-13/18 - payment	\$ 247.05	17
Robert Kroeker		6	Harrison Hot Springs Resort - Meeting Sep 12-13/18 - payment	\$ 82.35	17
Robert Kroeker		6	Harrison Hot Springs Resort - Meeting Sep 12-13/18 - payment	\$ 247.05	17
Robert Kroeker		6	Harrison Hot Springs Resort - Meeting Sep 12-13/18 - refund	\$ (429.41)	17
Robert Kroeker		7	Harrison Hot Springs Resort - Meeting Sep 12-13/18 - payment	\$ 24.67	17
Robert Kroeker		8	Law Society of BC Inv 1007519 - 2019 Practice Fee	\$ 2,373.18	1
Robert Kroeker		11	Grand Villa Centro Bar	\$ 37.72	27
Robert Kroeker		12	The Continuing Legal Education Society of BC Inv 248571 - Anti-Money Laundering 2019 course	\$ 649.95	1
Robert Kroeker		12	Vancouver parking	\$ 1,143.45	n/a
Total expenses paid through Accounts Payable				<u>\$ 26,000.98</u>	
Total Expenses				<u>\$ 59,063.48</u>	

Kevin Simcoe

From: Rob Kroeker
Sent: July-02-19 7:23 AM
To: Brad Desmarais
Subject: Re: Google Alert - money laundering casino

Looks good.

s 22 we have an ad hoc exec meeting today

R Kroeker

On Jul 1, 2019, at 10:10 PM, Brad Desmarais <BDesmarais@bclc.com> wrote:

s 13(1), s 15(1)

Brad Desmarais
Vice President, Casino and Community Gaming

BCLC, 2940 Virtual Way, Vancouver, B.C. V5M 0A6
T 604 225 6408 C s 17(1) F 604 225 6488

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Google Alerts <googlealerts-noreply@google.com>
Sent: July 1, 2019 12:48 PM
To: Brad Desmarais <BDesmarais@bclc.com>
Subject: Google Alert - money laundering casino



money laundering casino

As-it-happens update · July 1, 2019

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CasinoBeats

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CasinoBeats

... valued at \$17.3bn, comprised of \$7.2bn in cash, approximately 77 Eldorado common shares and the assumption of Caesars outstanding net debt.



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The regulated **casino** market in UK
Business MattersBusiness Matters

It would also assist the UKGC with the prevention of money laundering and other criminal activities that may be committed through online casino ...



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Kevin Simcoe

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Sent:
To:
Subject:

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This is an automatically generated message. ** PLEASE DO NOT REPLY **.

Work item in R/3 System: HMR

This is an automatically generated message. ** PLEASE DO NOT REPLY **.

Approve Expense statement for Kevin deBruyckere

You have the following new Expense work item to approve in the SAP System.
You can execute the work item through the following link to SAP Self-Serve.

IMPORTANT: DO NOT use the 'BACK' button of your browser when inside the work item. If you must leave the item, use the 'CANCEL' function instead.

Link to SAP Self-Serve:

s 15(1)

Trip Summary(at time of submission)

Personnel Name:Kevin deBruyckere

Personnel Number:S 22

Trip Number:1000049704

Destination:Vancouver

Reason:Meetings

Departure:

Return:

Estimated Cost:0.00CAD

Actual Cost:140.91CAD

Advance:0.00CAD

IMPORTANT: The actual costs may have changed since this email was generated. It is important you review the actual expense details before approving the expenses.

Kevin Simcoe

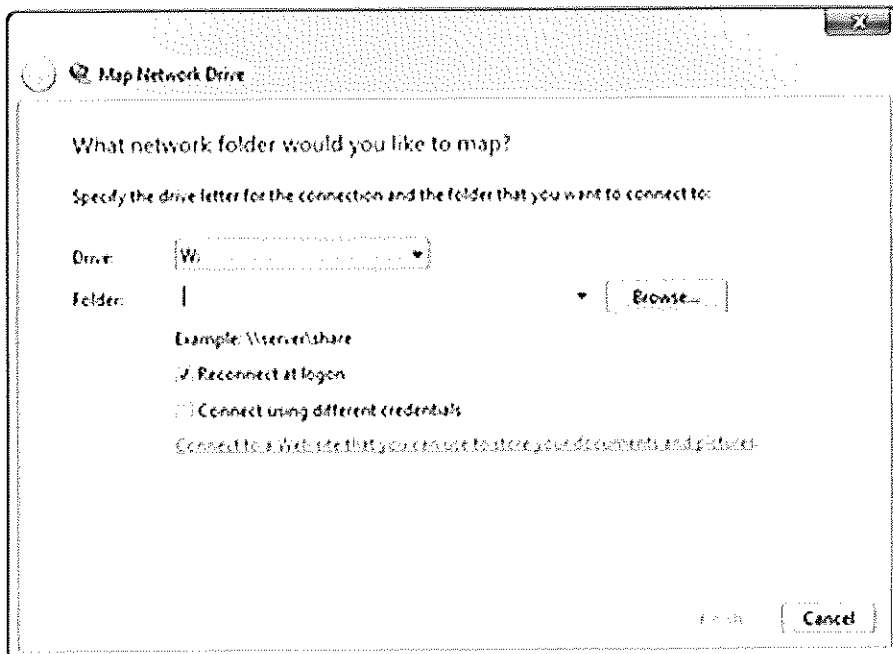
From:
Sent:
To:
Subject:

You have been given access to (John Karlovcec's) Z:\ drive and email for the next 30 days. If you do not want the email forwarded to you, please reply back advising you'd like to be removed.

You must LOG OFF and back on again BEFORE mapping drive.

To access the employee's Z:\ drive s 15(1)

\\vanfile\users2\JKarlovcec



Please call if you have any questions or if you need further assistance.

Thank you,

Identity & Access

Technology Security Enablement
BCLC, 74 West Seymour Street, Kamloops B.C. V2C 1E2

T 1 855 554 5665 (Toll Free – Canada) or ext 5665
T 250 828 5665 (All Others)

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject: s 22

Here's the article s 22

There's a video report from Sam Cooper embedded in this one as well.

<https://globalnews.ca/news/4658161/fentanyl-wealth-compound-british-columbia/>

Kevin

From: Kevin deBruyckere
Sent: July-02-19 8:06 AM
To: Daryl Tottenham <DTottenham@BCLC.com>
Cc: Rob Kroeker <RKroeker@bclc.com>
Subject: s 22

Vancouver Sun article from 2016 with from more detail.

<https://theprovince.com/business/real-estate/mysterious-wheeler-dealer-is-at-centre-of-a-web-of-b-c-real-estate-deals>

Kevin deBruyckere
Director, AML & Investigations
Legal, Compliance, Security
British Columbia Lottery Corporation

2940 Virtual Way, Vancouver BC V5M 0A6
T 604 228 3110 | C s 17(1)

• Yes, and... •

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject: s 22

Sounds good. We will recommend some response messaging later this afternoon. At this point, just trying to understand the background/facts so we can best recommend a response. More to come...

Cheers,

Lara

Lara Gerrits
Manager, Media & Issues Management
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6
T 604 228 3066 C s 17(1)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Rob Kroeker <RKroeker@bclc.com>
Sent: July-02-19 8:55 AM
To: Lara Gerrits <LGerrits@bclc.com>
Cc: Kevin deBruyckere <KdeBruyckere@bclc.com>; Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Subject: RE:s 22 media request

s 13(1), s 22

From: Lara Gerrits <LGerrits@bclc.com>
Sent: July-02-19 8:50 AM
To: Rob Kroeker <RKroeker@bclc.com>
Cc: Kevin deBruyckere <KdeBruyckere@bclc.com>; Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Subject: RE:s 22 media request

Thanks, Rob. Based on this, is it accurate to say that information from the report was shared with the audiences you outlined, and informed AML program changes; however, that the report in its entirety was not shared? I'll loop in with Kevin and his team later today re: other information related to these questions that we should consider as part of our response points.

Cheers,

Lara

Lara Gerrits
Manager, Media & Issues Management
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6

T 604 228 3066 C s 17(1)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Rob Kroeker <RKroeker@bclc.com>

Sent: July-02-19 7:56 AM

To: Lara Gerrits <LGerrits@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>

Cc: Kevin deBruyckere <KdeBruyckere@bclc.com>; Laura Piva-Babcock <LPiva-Babcock@bclc.com>

Subject: RE: s 22 media request

Good morning Lara

Kevin and his team are doing some work on this and will get back to your shortly.

s 13(1)

Thanks,

Rob

From: Lara Gerrits <LGerrits@bclc.com>

Sent: June-28-19 1:46 PM

To: Jim D. Lightbody <JDLightbody@bclc.com>; Rob Kroeker <RKroeker@bclc.com>

Cc: Kevin deBruyckere <KdeBruyckere@bclc.com>; Laura Piva-Babcock <LPiva-Babcock@bclc.com>

Subject: s 22 media request

Hi Jim and Rob,

Wanted to let you know that we received a media request from s 22 this afternoon. s 22

We will send through our recommended response points early next week – but wanted to make you aware.

Thanks so much,

Lara

Lara Gerrits

Manager, Media & Issues Management
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6
T 604 228 3066 C s 17(1)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From:
Sent:
To:
Subject:

Thank you!

From: Rob Kroeker <RKroeker@bcllc.com>
Sent: Tuesday, July 02, 2019 8:00 AM
To: Nicole Wu <NWu@BCLC.com>
Subject: RE: Spend Dynamics - P-card Approval

Good morning – done!

From: Nicole Wu <NWu@BCLC.com>
Sent: June-28-19 3:08 PM
To: Rob Kroeker <RKroeker@bcllc.com>
Subject: Spend Dynamics - P-card Approval

Rob,
When time permits next week please go in Spend Dynamics to approve the expenses paid against my p-card for the food ordered at Earls on June 25, 2019.
Thank you!
Nicole

Kevin Simcoe

From:
Sent:
To:
Subject:

Thank you.

Jennifer M. Keim
General Counsel
T 250 828-5557
Email: jkeim@bclc.com

This email is intended only for the addressee and contains privileged legal advice. **DO NOT FORWARD THIS EMAIL**
This email is for internal BCLC use only.

From: Rob Kroeker <RKroeker@bclc.com>
Sent: July 2, 2019 10:05 AM
To: Jennifer Keim <JKeim@BCLC.com>
Subject: RE: Next week

No problems 22

From: Jennifer Keim <JKeim@BCLC.com>
Sent: July-02-19 10:03 AM
To: Rob Kroeker <RKroeker@bclc.com>
Subject: Next week

Rob –

s 22

Regards,

Jennifer M. Keim
General Counsel
BCLC, 74 W. Seymour St., Kamloops, BC V2C 1E2
T 250 828-5557 F 250 828-5637
Email: jkeim@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From:
Sent:
To:
Subject:

Good morning,

I hope you all had a wonderful long weekend with your family and friends.

Last week, I was in Montreal at La Fleur's Lottery Innovation Exchange. I always value these conferences as they bring our industry together to learn, collaborate and talk about how might we tackle some of the toughest problems we are facing. We know that the lottery industry has an ongoing challenge to stay relevant, so we need to be creative in how we serve our customers, deliver on their ever-changing expectations and innovate around their experience with us. Our friends at Loto Quebec did an outstanding job in bringing in speakers from outside and inside the lottery industry to provide interesting perspectives, including our very own Sanam Bakhtiar, Juliette Link and Marshall Behrns.

One of the most interesting and quite frankly, surprising perspectives was from Georges St-Pierre (GSP), Mixed Martial Arts World Champion, whom I am sure many of you know. GSP has a great story and one of the highlights for me was when he spoke about his approach to innovation – *"if it ain't broke, break it"*. That notion of continuing to stay curious and take the right kind of risks to make something even better, whether that be in life or in business, is a lesson we all can benefit from.

GSP also talked about the fact that you should seek to learn from different perspectives. In our business, the latest cohort from our Emerging Leaders program graduated last Tuesday. I want to recognize Arnaud Granoux, Tracy Kiley, Michelle Yueh, Linda Cunningham, Brad Rudnicki, Jennifer Blasko, Justin Barbosa, Neil Gelineau, Govind Minhas, Gavin Bailey, Andreas Mueller, Julie Ivanusec, Heather Kennelly, Lauren DiMambro, Reg Devick, Lawson Cham and Amy Grant for their dedication to the program. I know there is a lot that we all can learn from each of your perspectives – congratulations!

Last Wednesday also marked a significant milestone with the launch of our new intranet – The Hub. I really appreciate the work of the project team, lead by Aly Couch, to deliver a tool that will provide the employee experience our people told us they wanted in the collabsmart consultations a few years back. In the spirit of continuous improvement, over the coming weeks and months, more pages and content will be added to The Hub and adjustments will be made based on feedback from each of you. You can send that feedback by scrolling to the bottom of the homepage and adding your thoughts in the comments section.



This week, I am meeting with Mike Hurley, the Mayor of Burnaby, to inform him on our anti-money laundering (AML) program and the work we are doing to safeguard our casinos. This is something that I, along with Greg Walker, Director, Public Affairs have invested significant time to help our key stakeholders understand BCLC's role in the AML regime. On that front, as you may know, last week was John Karlovcec's last week with BCLC as he headed off into retirement, for the second time! I am very appreciative for all the work John has done for our business and his support of the team and helping Kevin deBruyckere step into the Director AML & Investigations role.

Have a fun week,

Jim Lightbody
President & CEO

BCLC Head Office
74 West Seymour Street, Kamloops BC V2C 1E2
T s 17(1)

BCLC Marketing & Sales Office
2940 Virtual Way, Vancouver BC V5M 0A6
T s 17(1)

jdlightbody@bclc.com
bclc.com

Kevin Simcoe

From:
Sent:
To:
Subject:

[https://trace2.box.com/v/S 15\(1\)](https://trace2.box.com/v/S%2015(1))

password –s 15(1)

s 15(1)

Kevin

From: Rob Kroeker <RKroeker@bcllc.com>
Sent: July-02-19 10:22 AM
To: Kevin deBruyckere <KdeBruyckere@bcllc.com>
Subject: TRACE event

Do you have the website address for the session materials by any chance – it was on our name badges and I left mine at home.

R

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:

Good morning Bob

Approved.

Rob Kroeker

Chief Compliance Officer & VP Legal, Compliance, Security
British Columbia Lottery Corporation

2940 Virtual Way, Vancouver BC V5M 0A6
T 604.228.3077 | Ms 17(1) | F 604.225.6488

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From: Bob Madill
Sent: July-02-19 10:28 AM
To: Rob Kroeker ; Laura Piva-Babcock
Cc: Nicole Wu
Subject: VP Sign Off: BCLC FOI File 19-026 (Shipment Two)

Good morning Rob and Laura,

The following file is ready for your review and sign off on the file share [here](#).

BCLC FOI File 19-026 (Shipment Two)

"all records of any kind concerning the "extensive evaluation" referred to, and records relating to correspondence with the five municipalities referred to in the press release dated 08/03/2019 closure of expression of interest regarding the North Shore. As well, I am seeking all records of any kind related to the "dialogue" with local governments that indicates the "placement" of a gambling facility is not achievable as it relates to the North Shore."

The second shipment response consists of 114 pages of records, is information already released under a previous FOI file, or that has been consented to release by third parties.

Please respond by end of day **Friday, July 5, 2019**.

Let me know if you have any questions or concerns.

Best regards,
Bob

Bob Madill, CIPP/C
Manager, FOI and Information Governance
Legal, Compliance, Security
BCLC Kamloops office
T 250 852 5207 M s 17(1)
Local 5207

●Yes, and...●

Kevin Simcoe

From:
Sent:
To:
Subject:

Will do.
D

-----Original Message-----

From: Rob Kroeker <RKroeker@bclc.com>
Sent: Tuesday, July 02, 2019 10:01 AM
To: Daryl Tottenham <DTottenham@BCLC.com>
Subject: FW: Unusual Financial Transaction

Hi - can come off this email list.

-----Original Message-----

From s 15(1)
Sent: July-02-19 9:43 AM
To: John Karlovcec <JKarlovcec@bclc.com>; amlanalysts <amlanalysts@bclc.com>; Daryl Tottenham <DTottenham@BCLC.com>; Jim Husler <JHusler@BCLC.com>; Lynn Cousins <LCousins@BCLC.com>; Sheila Bondesen <SBondesen@bclc.com>; Stone Lee <SLee@BCLC.com>; Kris Gade <KGade@BCLC.com>; Joseph Depaulo <JDepaulo@BCLC.com>; Courtney Robinson <CRobinson@bclc.com>; Bruno Gatto <BGatto@bclc.com>; Mark Dickenson <KDickenson@bclc.com>; Marcia Guizzo <MGuizzo@bclc.com>; mhiller@bclc.com; Craig Morphet <MMorphet@bclc.com>; jramsay@bclc.com; Jason Lanki <JLanki@BCLC.com>; Amy Braithwaite <ABraithwaite@bclc.com>; Andrew Brintnell <ABrintnell@bclc.com>; Brandi Chan <BChan@bclc.com>; Brandon Norgaard <BNorgaard@bclc.com>; Cameron Dodson <CDodson@BCLC.com>; Craig Longley <CLongley@bclc.com>; Giulia Fabbro <GFabbro@bclc.com>; Paul Stanney <PStanney@bclc.com>; Rob Stratford <RStratford@bclc.com>; Tom Plante <TPlante@BCLC.com>; Rolly Dioquino <RDioquino@BCLC.com>; Steve Beeksma <SBeeksma@BCLC.com>
Subject: Unusual Financial Transaction

Unusual Financial Transaction

Property: s 15(1), s 22

s 15(1), s 19, s 22

File details: s 15(1), s 22

Kevin Simcoe

From: +2508285599
Sent:
To:
Subject:

Missed call from +2508285599 (Other)

+2508285599
Other: +2508285599

Kevin Simcoe

From:
Sent:
To:
Subject:
Attachments:

I don't think we'll need to prepare anything, however, here's a DRAFT deck I've put together for training...

The content, in my view, supports the current process remain in place.

Kevin

From: Jennifer Gallaway <JGallaway@BCLC.com>
Sent: July-02-19 11:28 AM
To: Rob Kroeker <RKroeker@bclc.com>; Kevin deBruyckere <KdeBruyckere@bclc.com>
Subject: Discussion re R5/6 Briefing Note

Good morning,

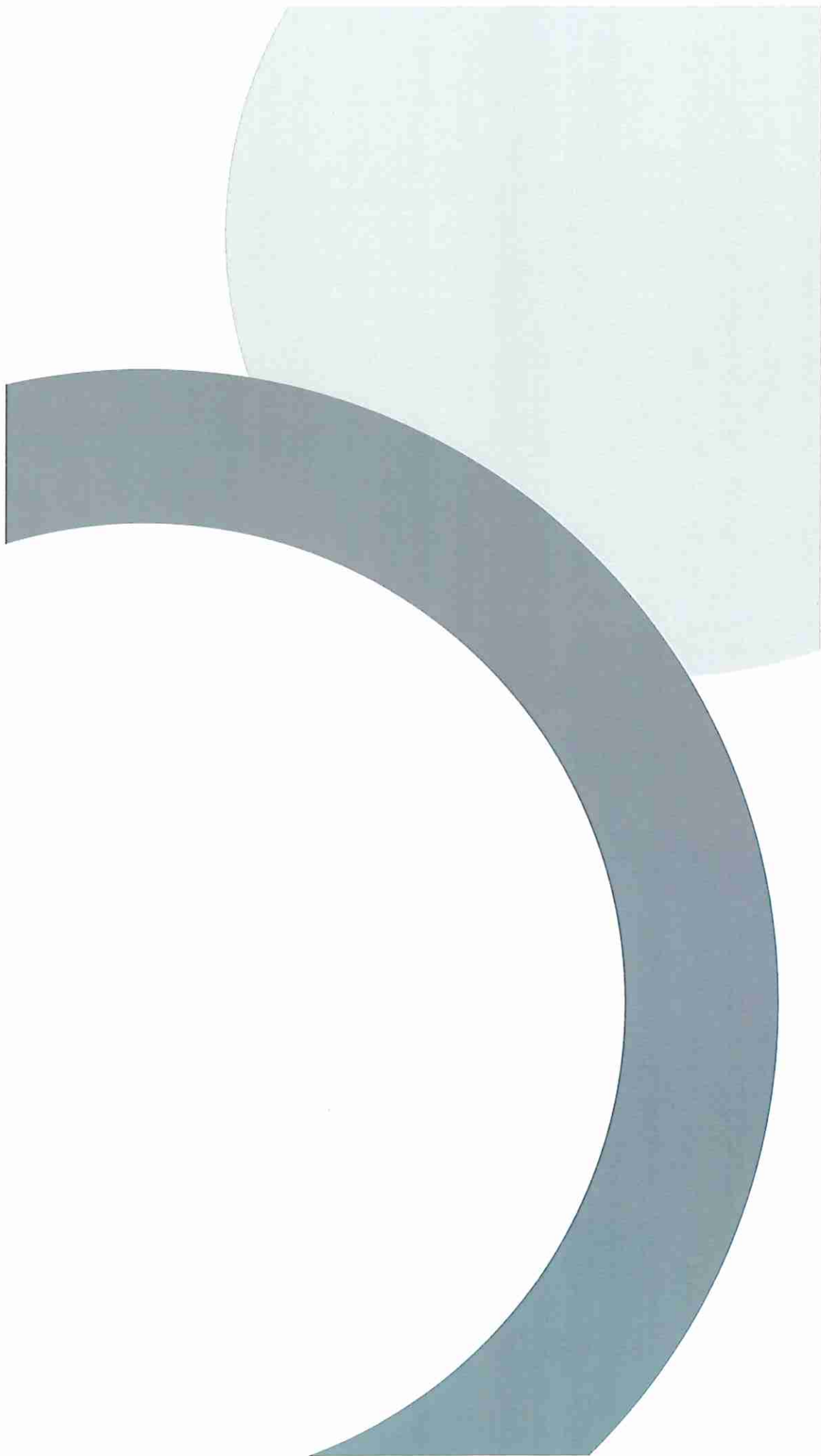
As requested, I have set up a meeting to brief Jim on the R5/6 BN tomorrow at 2:30. Do you anticipate this just being a verbal briefing or is there anything that I should prepare/bring?

Thank you!

Jennifer Gallaway, MBA
Interim Director, AML Response
BCLC
2940 Virtual Way, Vancouver BC V5M 0A6
T 604 228 3120 C s 17(1)

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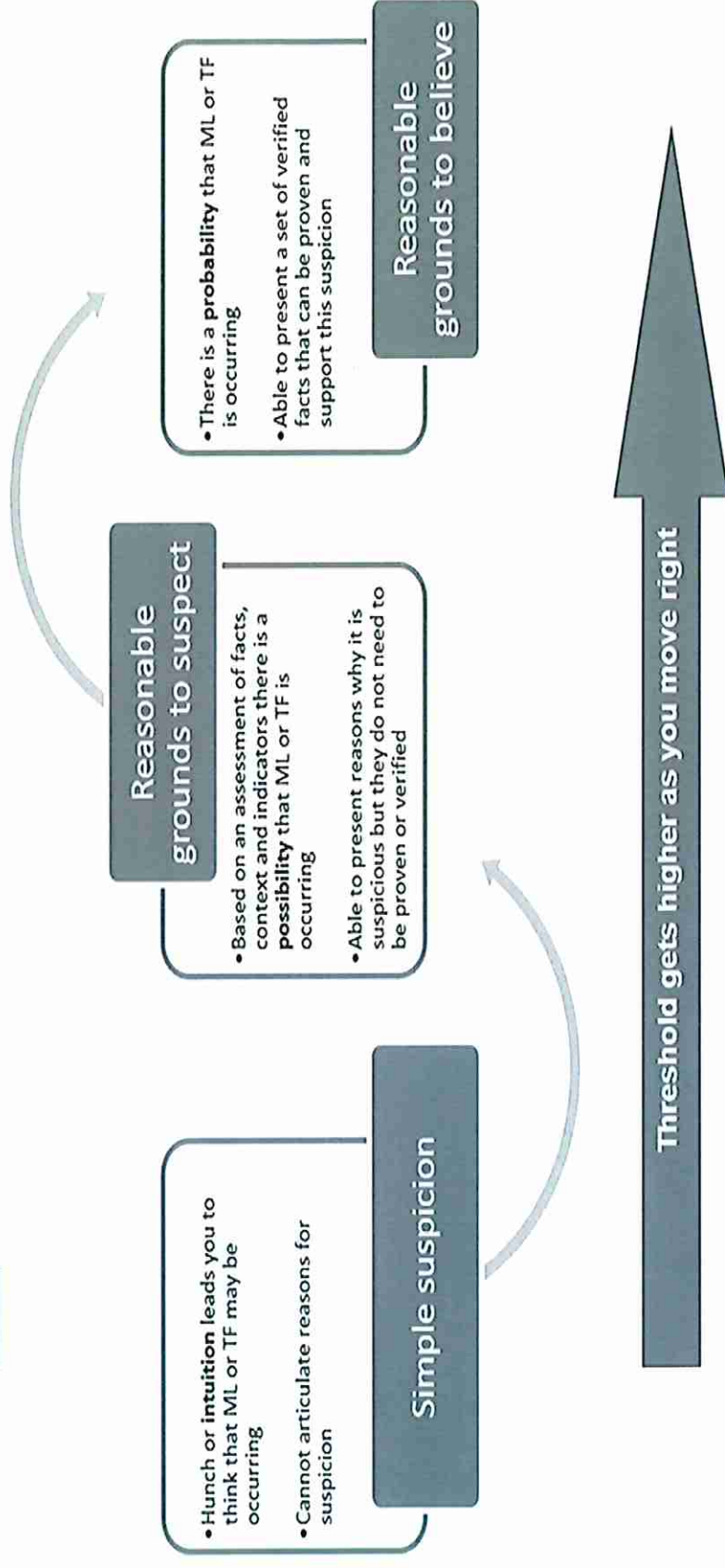




The Suspicious Transaction Report

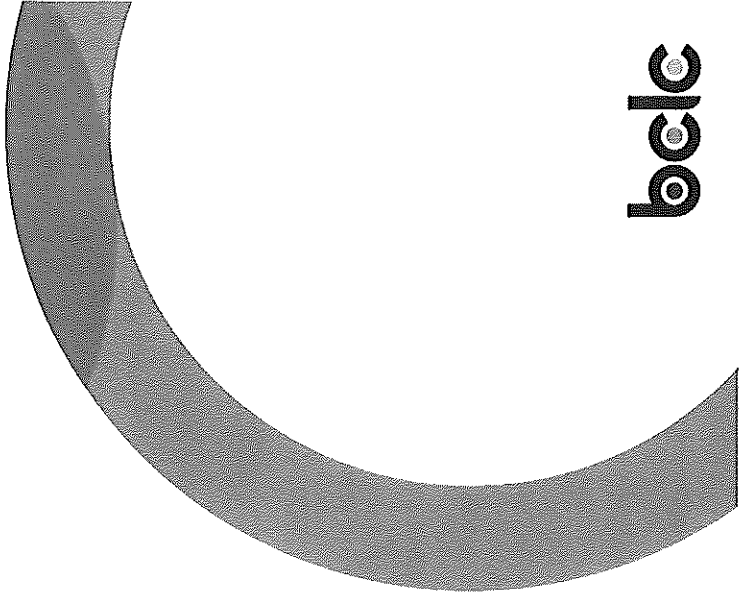
- FINTRAC uses these reports to assess and analyze financial transactions to create a picture that serves to uncover financial relationships and networks that will:
 - assist in criminal investigations and prosecutions of offences related to ML/TF, as well as threats to the security of Canada;
 - detect trends and patterns related to ML/TF risks;
 - uncover vulnerabilities to Canada's financial system; and
 - enhance public awareness of ML/TF matters.

Reasonable Grounds to Suspect



The Structure – Part G

1. Key Findings
2. Subjects of Investigation
3. Details
4. Conclusion with money laundering indicators.



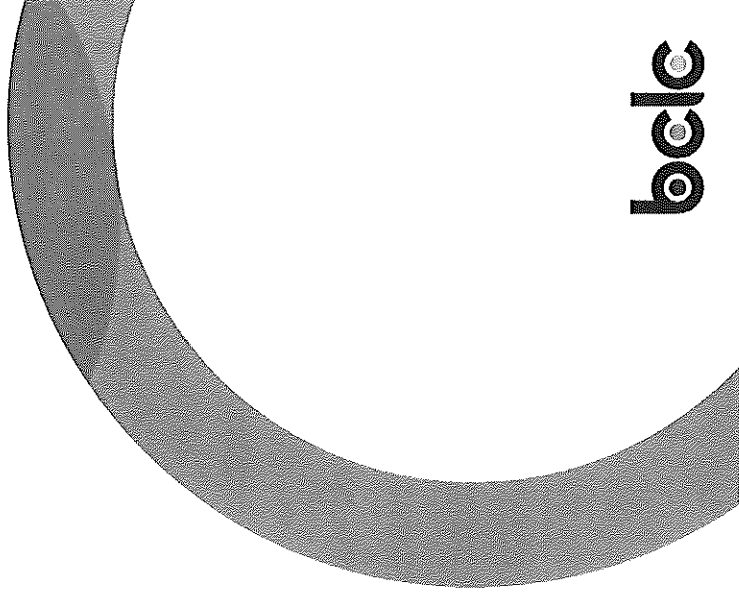
Just the Facts

- The new STR guidance.

- Facts – the “actual event, action, occurrence or element that exists or is known to have happened or existed.” s 15(1)
- Context – s 15(1)
This involves clarifying a set of circumstances or providing an explanation of a situation, which could lead to a review of past transactions involving the patron. Your suspicion of ML/TF will most likely materialize out of an assessment of multiple elements that, when viewed together, will either inform or negate suspicion of ML/TF.
- ML/TF Indicators

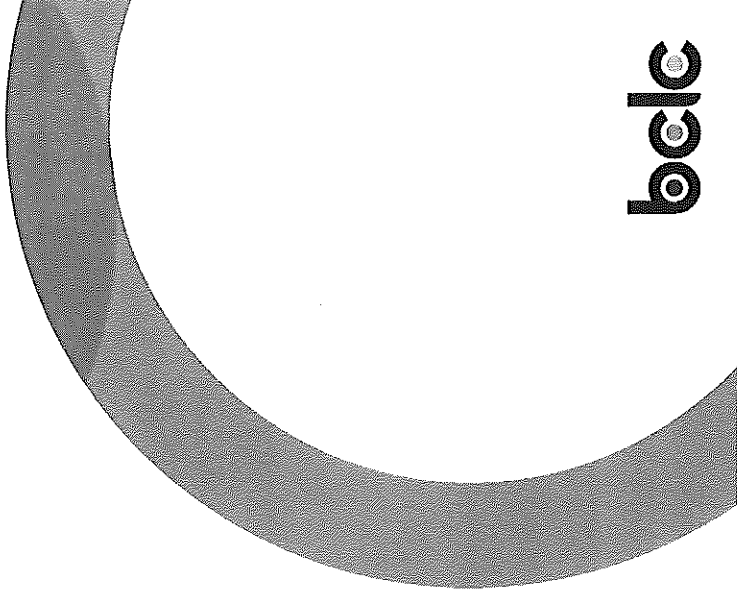
And there's more...

- If you submitted an STR to FINTRAC in respect of a financial transaction(s) conducted by a client, you should continue to submit STRs as long as the suspicions of ML/TF continue.
- periodically re-assess the information to evaluate your grounds for suspicion.



What to avoid

- avoid jargon or non-public references, such as terms and acronyms that are specific to your organization
 - consider an outside reader and use simple, clear and concise language.
- Assumptions – the facts should speak for themselves.



Kevin Simcoe

From:
Sent:
To:
Subject:
Attachments:

Importance: High

Deloitte Statement of Work. I've also attached the signed copy.

Kevin

From: Bal Bamra <BBamra@BCLC.com>
Sent: May-15-19 4:13 PM
To: Kevin deBruyckere <KdeBruyckere@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>
Subject: FW: SOW - AML (Deloitte LLP)
Importance: High

Are you guys good with this being sent to Deloitte for signing?

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

• Yes, and... •

bbamra@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Bal Bamra <BBamra@BCLC.com>
Sent: May-13-19 5:17 PM
To: Kevin deBruyckere <KdeBruyckere@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>
Cc: Bal Bamra <BBamra@BCLC.com>
Subject: FW: SOW - AML (Deloitte LLP)
Importance: High

Hi,

For your review. Any edits, please let me know before I send off to Deloitte for signing.

I see a few spacing errors and additional letters (i.e. ii) in the document to be edited, but the content is good for me.

Let me know your thoughts.

Thanks,

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

●Yes, and...●

bbamra@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Vivian Wilson <VWilson@bclc.com>

Sent: May-12-19 4:03 PM

To: Bal Bamra <BBamra@BCLC.com>

Subject: RE: SOW - AML (Deloitte LLP)

Importance: High

Hi Bal,

We just received an update from GPEB for Deloitte LLP SOWs:

Individual GPEB registration (GW registration) can now be used interchangeably, so whether workers are registered under Deloitte Inc. or LLP does not matter, as long as they are registered under at least one of those two entities. **This is a temporary compromise until Deloitte LLP renews their corporate registration in 2021.**

Accordingly, please find attached clean (PDF) and blackline (Word) versions of the revised Deloitte SOW re AML Assessment Report. Please review this document carefully and, if in order, have it signed by Deloitte then by BCLC (in accordance with BCLC's policy on Signing and Spending Authority) and return a fully executed copy to me.

If you require any further changes to the document before it is executed, please let me know as soon as possible.

Kind regards,

Vivian

Vivian Wilson
Manager, Contracts
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3006 E vwilson@bclc.com

From: Vivian Wilson

Sent: May-09-19 1:14 PM

To: Bal Bamra <BBamra@BCLC.com>

Subject: RE: SOW - AML (Deloitte LLP)

Hi Bal,

Thanks for following up.

I am hoping to look at this document this afternoon. I expect to have it back to you either today or tomorrow.

Kind regards,

Vivian

Vivian Wilson
Manager, Contracts
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3006 E vwilson@bclc.com

From: Bal Bamra <BBamra@BCLC.com>
Sent: May-09-19 12:29 PM
To: Vivian Wilson <VWilson@bclc.com>
Subject: RE: SOW - AML (Deloitte LLP)

Hi Vivian,

I was just hoping you had an update for me on this?

Thanks,

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

● Yes, and... ●

bbamra@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Vivian Wilson <VWilson@bclc.com>
Sent: May-01-19 8:37 AM
To: Bal Bamra <BBamra@BCLC.com>
Subject: RE: SOW - AML (Deloitte LLP)

Thank you for sending this so quickly, Bal.

I will review and revert. To keep you updated regarding timelines, this review is currently number 12 in the Contract Management queue. I expect to have this SOW back to you early next week.

Kind regards,
Vivian

Vivian Wilson
Manager, Contracts
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3006 E vwilson@bclc.com

From: Bal Bamra <BBamra@BCLC.com>
Sent: April-30-19 6:07 PM
To: Vivian Wilson <VWilson@bclc.com>
Cc: Jennifer Dollard <JDollard@bclc.com>; Amanda Wandler <AWandler@bclc.com>; Jennifer Hahn <JHahn@bclc.com>; Bal Bamra <BBamra@BCLC.com>
Subject: RE: SOW - AML (Deloitte LLP)

Hi Vivian,

Please find attached the Recommendation of Award.

Please let me know if this is sufficient.

I have notified the successful and unsuccessful vendor via email re: VRQ.

I have also let Deloitte know about the GPEB requirements.

Please let me know if there is anything else you need.

Thanks,

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

•Yes, and...•

bbamra@bcllc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Vivian Wilson <VWilson@bcllc.com>

Sent: April-30-19 11:36 AM

To: Bal Bamra <BBamra@BCLC.com>

Cc: Jennifer Dollard <JDollard@bcllc.com>; Amanda Wandler <AWandler@bcllc.com>

Subject: RE: SOW - AML (Deloitte LLP)

Hi Bal,

Further to Jennifer Hahn's email (attached hereto for ease of reference) can you please send me the recommendation form.

s 13(1), s 17(1)

However, from a Contract Management perspective, it is often more efficient to have the vendor notified of the award prior to the contract negotiations/drafting stage so that less revisions are required after the initial CM review, as CM is required to review any further changes made to the documents we have already reviewed and approved.

It is also easier for GPEB registration purposes so that the vendor can obtain any required corporate and personnel registrations in time to begin the work. Please keep these factors in mind when deciding when to inform the vendor of the contract award.

If you have any additional questions or require further information, please do not hesitate to ask.

Kind regards,
Vivian

Vivian Wilson
Manager, Contracts
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3006 E vwilson@bcllc.com

From: Bal Bamra <BBamra@BCLC.com>

Sent: April-29-19 5:38 PM

To: Jennifer Dollard <JDollard@bclc.com>; Amanda Wandler <AWandler@bclc.com>; Vivian Wilson <VWilson@bclc.com>

Subject: RE: SOW - AML (Deloitte LLP)

Hi,

Deloitte hasn't been notified that they are being awarded this contract. I thought we had to get the contract reviewed first?

What are the steps so that I don't speak out of turn on this?

Thanks,

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

• **Yes, and...** •

bbamra@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Jennifer Dollard <JDollard@bclc.com>

Sent: April-29-19 4:51 PM

To: Amanda Wandler <AWandler@bclc.com>; Vivian Wilson <VWilson@bclc.com>; Bal Bamra <BBamra@BCLC.com>

Subject: SOW - AML (Deloitte LLP)

Hi there,

I had GPEB review the draft SOW and here is the final word from them on the requirements for the AML work that will be done by Deloitte LLP.

- 1) All persons working on this SOW LLP contract require Gaming worker registration under Deloitte LLP. Persons working under that contract cannot work using a BCLC (contractor) registration (ie: Deloitte Inc. PREG). They will require Deloitte to register them under Deloitte LLP's registration.

The only 3 with the appropriate registration are:

s 22

The 4 below are not registered.

s 22

****Bal – please advise your contact at Deloitte LLP to process registration for the 4 individuals who are not registered.**

Please give me a call tomorrow if you have any questions.

Jen

From: Jennifer Dollard
Sent: Friday, April 26, 2019 1:48 PM
To: Amanda Wandler <AWandler@bclc.com>
Subject: FW: Statement of Work Review

Here you go

From: ContractManagement <ContractManagement@BCLC.com>
Sent: Friday, April 26, 2019 10:00 AM
To: Vivian Wilson <VWilson@bclc.com>
Cc: Jennifer Dollard <JDollard@bclc.com>; Bal Bamra <BBamra@BCLC.com>
Subject: FW: Statement of Work Review

Hi Vivian,

Please work with Bal (cc') to review the attached SOW.

Jennifer: Please advise Vivian on GPEB requirements.

Regards,

Amanda Wandler, JD
Contract Specialist
BCLC, 74 West Seymour Street Kamloops, B.C. V2C 1E2
T 250 852 5350

awandler@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Bal Bamra <BBamra@BCLC.com>
Sent: Friday, April 26, 2019 7:09 AM
To: ContractManagement <ContractManagement@BCLC.com>
Cc: Bal Bamra <BBamra@BCLC.com>
Subject: Statement of Work Review

Hi,

Please find attached the SOW for your review. There are a few concerns noted that I'm hoping you will guide me through.

I have also included the two proposals and the original Vendor Request Quote that went out.

Let me know if you require any further information.

Thanks,

Bal Bamra BCom, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

•Yes, and...•

bbamra@bclc.com

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

STATEMENT OF WORK
Project Name: Anti-Money Laundering (AML) Assessment Report
Primary Bid Process: RFPQ 1516-160201SS
Secondary Bid Process: VRQ 1920-190404BB

This Statement of Work ("SOW") is made effective July 29, 2019 (the "Effective Date") between British Columbia Lottery Corporation ("BCLC") and B.C. Lottotech International Inc. (collectively, "BCLC") and Deloitte LLP ("Consultant"). BCLC and Consultant have entered into a Master Services Agreement made effective April 15, 2016 (as it may be amended or replaced from time to time, the "Agreement"). This SOW is subject to and incorporated into the Agreement. Consultant will perform the Services and Deliverables set out herein in accordance with this SOW and the Agreement.

SERVICES LOCATION

Consultant will perform the services remotely from Consultant's own offices, onsite at BCLC's offices, and at select gaming facilities, as required.

For clarity, testing, interviews and other execution processes will be performed remotely from Consultant's offices, on-site at BCLC's offices and at select gaming facilities. Interviews and other execution processes will be performed at BCLC's Vancouver office and select gaming facilities.

Consultant will be onsite at BCLC's centralized AML operations center as well as a select sample of BCLC's gaming facilities. Consultant will make reasonable efforts to provide at least 4 weeks' advance notice, and in any event, no less than 2 weeks' advance notice, of the locations selected for on-site work. No sensitive or confidential data (as determined by BCLC) will be removed from BCLC databases, and any examination of databases containing personal, security or financial information will be done on site at BCLC only.

BCLC PROJECT MANAGER

Bal Bamra, Manager, AML Intelligence
Phone: 604-910-7897
Email: bbamra@bclc.com

TERM

This SOW will be effective from the Effective Date to **September 30, 2019**.

SERVICES

BCLC is retaining Consultant's services to complete an independent assessment of BCLC's Anti-Money Laundering ("AML") and sanctions compliance programs in accordance with the requirements outlined by the Financial Transactions and Reports Analysis Centre of Canada ("FINTRAC"). The Proceeds of Crime (Money Laundering) and Terrorist Financing Act (Regulations) ("PCMLTFA") require that reporting entities undergo a comprehensive AML review biennially.

s 15(1), s 21

CONSULTANT PERSONNEL

Consultant will assign the following personnel to the Services:

Name s 15(1), s 22	Title	GPEB # s 15(1)	GPEB Expiry
	Partner		
	Partner		
	Director		
	Senior Manager		
	Manager		
	Consultant		
	Consultant		

Any addition to or replacement of such personnel must be pre-approved by BCLC in writing using the change process set out below.

FEES

Consultant's fees will be based on the amount of professional time required to provide the Services and the hourly billing rates below, which vary depending upon the experience level of the professionals involved. All prices are quoted in Canadian dollars, excluding taxes and expenses.

Title	Hourly Rate s 21	Estimated effort (hours)	Total Estimated Fees
Partner			
Senior Manager			
Manager			
Consultant			
Estimated Total		s 21	\$94,553.00

The Fees will become payable upon written acceptance by BCLC of all Deliverables.

The total Fees payable pursuant to this SOW will not exceed \$94,553.00 excluding Taxes and Expenses. BCLC will reimburse Consultant for expenses that are pre-approved by the BCLC Project Manager and incurred by Consultant in accordance with the BCLC Contractors Travel and Expense Guideline as amended or replaced by BCLC from time to time in its discretion, the most recent version of which is attached hereto as Appendix A.

FEE AND EFFORT ASSUMPTIONS:

- BCLC will provide the necessary resources for the Consultant team including the following:
 - Reasonable workspace for all resources
 - Reasonable security access to the premises
 - Internet and network access
 - Access to applicable testing systems and data repositories
 - Access to print and copy services
 - Reasonable access to meeting rooms
- BCLC will identify, communicate to and help schedule required sessions with appropriate personnel (from both BCLC and casino service providers, where applicable) who have detailed knowledge of BCLC's AML and sanctions compliance programs and practices, and/or facilitate the coordination for information gathering and documentation.

IN WITNESS WHEREOF the parties have executed this SOW as of the date first above written.

BRITISH COLUMBIA LOTTERY
CORPORATION
s 22

Per: s 22

Authorized Signatory

Name: Kevin deBruyckere

Title: DIRECTOR, AML

Date: June 11, 2019

B.C. LOTTOTECH INTERNATIONAL INC.
s 22

Per:

Authorized Signatory

Name: Kevin deBruyckere

Title: DIRECTOR, AML

Date: June 11, 2019

Deloitte LLP

Per:

Deloitte LLP

Authorized Signatory

Name: Donna Fuller

Title: Partner

Date: June-7-2019

Kevin Simcoe

From:
Sent:
To:
Subject:

You can click [here](#) to review the materials posted on the website.

From: Rob Kroeker <RKroeker@bclc.com>
Sent: Tuesday, July 02, 2019 11:14 AM
To: Nicole Wu <NWu@BCLC.com>
Subject: FW: TRACE event

Hi – the site below is the materials from the conference last week. S 15(1)

[https://trace2.box.com/v/S 15\(1\)](https://trace2.box.com/v/S15(1))

password --s 15(1)

Kevin Simcoe

From:
Sent:
To:
Subject:

FYI some updates from Jenn B.

From: Jennifer R. Barbosa <jrbarbosa@bcllc.com>
Sent: Tuesday, July 02, 2019 12:55 PM
To: Nicole Wu <NWu@BCLC.com>
Subject: Re: Hi

Hi Nic,

s 22

No problem with the change in date/time with Rob. I'll make any time work for him.

Jenn

On Jul 2, 2019, at 10:26 AM, Nicole Wu <NWu@bcllc.com> wrote:

Good morning Jenn,

Hope you enjoyed some good rest over the long weekend. Just checking in to reschedule your monthly 1:1 with Rob on July 23rd due to conflicts with the Board meeting on that day. Rob is planning to arrive at Kamloops around noon on the 22nd Monday so I am thinking to move it to 2 pm. Let me know if that works for you.

Thanks,
Nicole

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:

Good afternoon Rob,

The following file is ready for your review and sign-off:

BCLC Freedom of Information Request 19-056
BCLC's response is due August 7, 2019.

Because the applicant is not from media, political party or other applicant type that may publicly disseminate and potentially publicly comment on the records, sign-off has not been sent to Laura.

Your response by **July 5, 2019** is most appreciated.

Thank you,

Kevin Simcoe, J.D., B.A
Senior Freedom of Information Analyst
BCLC, 74 West Seymour Street, Kamloops B.C. V2C 1E2
T 250 852 5228 F 250 828 5697

•Yes, and...•


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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:

Hi Kevin,
Rob has no responsive records for this request. He did not go to G2E Asia this year.
Best regards,
Nicole

From: Kevin Simcoe <KSimcoe@bclc.com>
Sent: Tuesday, July 02, 2019 2:02 PM
To: Jim D. Lightbody <JDLightbody@bclc.com>; Rob Kroeker <RKroeker@bclc.com>; Brad Desmarais <BDesmarais@bclc.com>; Pat Davis <PDavis@BCLC.com>; Kevin Gass <KGass@BCLC.com>; Cameron Adams <CAdams@BCLC.com>; Jamie Callahan <JCallahan@bclc.com>
Cc: Suzanne Rowley <SRowley@bclc.com>; Jen Viau <JViau@BCLC.com>; Nicole Wu <NWu@BCLC.com>; Holly Miggins <HMiggins@BCLC.com>; Karen Gaia-Maretta <KGaiaMaretta@BCLC.com>; Dona Saunders <DSaunders@BCLC.com>; Livia Costantino <LCostantino@BCLC.com>; Pina Naccarato <GNaccarato@bclc.com>
Subject: Records Collection: FOI Request 19-058

BCLC has received an FOI request for:

BCLC Freedom of Information Request 19-058:

"Regarding the visit to Macau for G2E Asia 2019 (May 21-23, 2019) and other events and attractions in Macau, Hong Kong and Guangdong before and after the G2E Asia convention, I seek:

- The list of names, titles and affiliations of all BCLC personnel, contractors, clients, and spouses and relatives (aka "BCLC persons and BCLC-related persons") who traveled to Macau, Hong Kong and Guangdong;
- Registration and accreditation documentation for each BCLC person and BCLC-related person who attended the convention; and
- Travel Expense Statements for each BCLC person and BCLC-related person on the trip."

Please provide an electronic copy of any records responsive to the above request by **July 9, 2019**.

If you are aware of anyone else that would have records responsive to this request, please let me know as soon as possible.

Thank you.

Regards,

Kevin Simcoe, J.D., B.A
Senior Freedom of Information Analyst
BCLC, 74 West Seymour Street, Kamloops B.C. V2C 1E2
T 250 852 5228 F 250 828 5697

• Yes, and... •

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

From: Hub
Sent:
To:
Subject:

The Hub Newsflash



Welcome to a weekly summary of recent news, upcoming events and special announcements at BCLC.

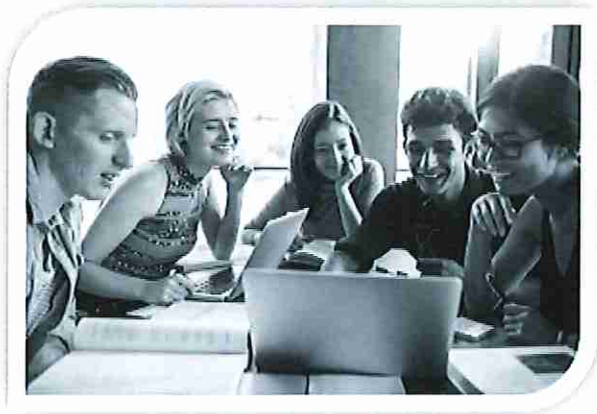
To keep up to date with BCLC in the media visit the [Media Monitoring](#) page and visit [The Hub](#) daily for current news.

Weekly Buzz

Welcome to The Hub Newsflash! We will continue to send out our weekly emails with a summary of the latest news and events happening around BCLC.

Remember to check out the [Hub 101](#) section for everything you need to know about The Hub.

If you have questions or need support, send an email to hub@bclc.com



Weekly Jim Session

[Learning and Improving Together](#)

News

[Welcome to The Hub](#)

[The Hub – Our Vision for Better Employee Communications](#)

[Employee Giving Committee Payroll Deduction Program Winners](#)

[Kamloops Committee Trade Show Winners](#)

Events

[Kamloops Social Club KIBT 2019](#)

[Vancouver Trade Show of Committees & Employee Clubs](#)

[Vancouver Social Club Lawn Bowling Event](#)

Check out what's listed in the [Marketplace](#), our new classifieds section.

Development

This month's featured development programs.

Internal Job Opportunities

To view our current internal opportunities, visit the Careers page in SuccessFactors

The Hub Newsflash is published weekly by the Communications team. To submit a story or event on The Hub, follow the Posting News & Events guide.

Kevin Simcoe

From: nnifer.l.potter@cgi.com>
Sent:
To:
Subject:
Attachments:

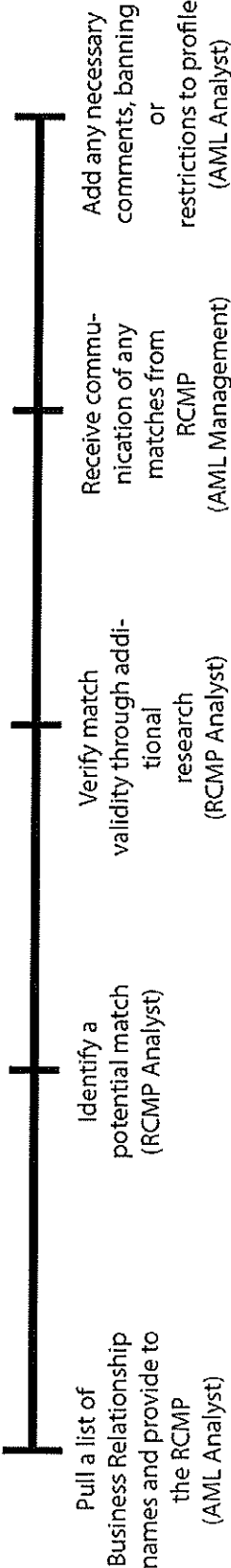
Hi Bal, Kevin, John, and Daryl,

Please see the revised current state for the PTEP process. This reflects the new process. How can the language be tweaked to more accurately depict the process? When reviewing, may you please pay specific attention to the last step (how the business relationship is managed).

Best regards,

Jenn Potter
s 22

CURRENT STATE



Kevin Simcoe

From:
Sent:
To:
Subject:

It is with regret that I inform you that Rob Kroeker, Vice-President for Legal, Security, Compliance & Chief Compliance Officer has left the organization effective today. Rob led the LCS team for four years and through a very challenging time for BCLC. I thank him for his contributions.

In the interim, Brad Desmarais has agreed to take on the role of VP, LCS & Chief Compliance officer while also maintaining his role as VP of Casino and Community Gaming. Many of you may be aware that Brad was the VP of Security & Compliance from 2013 to 2015 and I thank him for stepping up at this time.

We will begin recruiting for permanent VP, LCS & Chief Compliance Officer as soon as possible.

I recognize this is a time of significant change in the organization and that the LCS division has been working very hard over the last couple of years. I want to thank them all for their ongoing work and dedication and I ask that all of you support the team during this period of transition.

If you have any questions, feel free to reach out to me.

Sincerely,

Jim Lightbody
President & CEO

BCLC Head Office
74 West Seymour Street, Kamloops BC V2C 1E2
T s 17(1)

BCLC Marketing & Sales Office
2940 Virtual Way, Vancouver BC V5M 0A6
T s 17(1)

jdlightbody@bclc.com
bclc.com

Kevin Simcoe

From:
Sent:
To:
Subject:

LCS Division,

Please be advised that Brad Romano was the successful applicant for the role of "Senior Specialist, Player Heath Integration", which is a temporary (24 month) full-time position at BCLC starting on July 22, 2019. While I am sad to see him leave the Technical Compliance team and LCS division (temporarily), I am very happy that Brad will be staying with BCLC, and that he'll be getting the opportunity to explore an entirely new and exiting role.

Brad has been with BCLC since 2007, working in new product development, eCasino, and most recently as Senior Specialist, Technical Compliance.

The temporary (24 month) back-fill for Brad's position has been posted on SuccessFactors, and will remain available for applications until July 09, 2019.

Please feel free to give me a shout if you have any questions or comments. I'm happy to help!

Regards,

NT.

Noah Turner

Manager, Technical Compliance
Legal, Compliance, Security (LCS) Division
British Columbia Lottery Corporation (BCLC)

2940 Virtual Way, Vancouver, British Columbia, Canada V5M 0A6
T +1 (604) 225-6319 M 17(1) E nturner@bclc.com

•Yes, and...•

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across British Columbia.

Kevin Simcoe

From:
Sent:
To: rkroeker@svk604.localdomain
Subject:
Attachments: VoiceMessage.wav

Categories: ViewMail

Kevin Simcoe

From:
Sent:
To:
Subject:

Hello,
I wonder if you would have a few minutes to discuss the reason for your departure from BCLC.

Sincerely,

Bob Mackin
reporter, theBreaker.news
604-982-9130

--

Read [theBreaker.news](#)
[Listen to the theBreaker.news Podcast](#)
[Subscribe to the newsletter](#)

Kevin Simcoe

From:
Sent:
To: Callahan
Cc:
Subject:

No one attended the conference this year so there will be no responsive records.

Brad Desmarais
Vice President, Casino and Community Gaming

BCLC, 2940 Virtual Way, Vancouver, B.C. V5M 0A6
T 604 225 6408 C 604 225 6488 F 604 225 6488

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Kevin Simcoe <KSimcoe@bclc.com>
Sent: July 2, 2019 2:02 PM
To: Jim D. Lightbody <JDLightbody@bclc.com>; Rob Kroeker <RKroeker@bclc.com>; Brad Desmarais <BDesmarais@bclc.com>; Pat Davis <PDavis@BCLC.com>; Kevin Gass <KGass@BCLC.com>; Cameron Adams <CAdams@BCLC.com>; Jamie Callahan <JCallahan@bclc.com>
Cc: Suzanne Rowley <SRowley@bclc.com>; Jen Viau <JViau@BCLC.com>; Nicole Wu <NWu@BCLC.com>; Holly Miggins <HMiggins@BCLC.com>; Karen Gaia-Maretta <KGaiaMaretta@BCLC.com>; Dona Saunders <DSaunders@BCLC.com>; Livia Costantino <LCostantino@BCLC.com>; Pina Naccarato <GNaccarato@bclc.com>
Subject: Records Collection: FOI Request 19-058

BCLC has received an FOI request for:

BCLC Freedom of Information Request 19-058:

"Regarding the visit to Macau for G2E Asia 2019 (May 21-23, 2019) and other events and attractions in Macau, Hong Kong and Guangdong before and after the G2E Asia convention, I seek:

- The list of names, titles and affiliations of all BCLC personnel, contractors, clients, and spouses and relatives (aka "BCLC persons and BCLC-related persons") who traveled to Macau, Hong Kong and Guangdong;
- Registration and accreditation documentation for each BCLC person and BCLC-related person who attended the convention; and
- Travel Expense Statements for each BCLC person and BCLC-related person on the trip."

Please provide an electronic copy of any records responsive to the above request by **July 9, 2019**.

If you are aware of anyone else that would have records responsive to this request, please let me know as soon as possible.

Thank you.

Regards,

Kevin Simcoe, J.D., B.A
Senior Freedom of Information Analyst

BCLC, 74 West Seymour Street, Kamloops B.C. V2C 1E2
T 250 852 5228 F 250 828 5697

•Yes, and...•
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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

Kevin Simcoe

Subject:

Location:

Start:

End:

Show Time As: Tentative

Recurrence: (none)

Organizer:

Required Attendees:

Optional Attendees:

Your meeting was found to be out of date and has been automatically updated.

Updated meeting details:

Start Time

End Time

Location

Sent by Microsoft Exchange Server

Kevin Simcoe

Subject:

Location:

Start:

End:

Show Time As: Tentative

Recurrence: (none)

Meeting Status:

Organizer:

Required Attendees:

Optional Attendees:

Kevin Simcoe

Subject:

Location: Kam

Start:

End:

Show Time As: Free

Recurrence: (none)

Meeting Status:

Organizer:

Required Attendees:

Optional Attendees:

Importance: High

Kevin Simcoe

Subject:

Location: Kam

Start:

End:

Show Time As: Free

Recurrence: (none)

Meeting Status:

Organizer:

Required Attendees:

Optional Attendees:

Importance: High

Kevin Simcoe

Subject:

Location:

Start:

End:

Show Time As: Tentative

Recurrence: Monthly

Recurrence Pattern:

Meeting Status:

Organizer:

Required Attendees:

Hi Kevin,

As discussed I will include the pre-meet discussion for you and Rob in this 1:1 prior to your meeting with Anna and Tim (GPEB) on July 19th re: SoF and German recommendations updates.

Thanks,

Nicole

Kevin Simcoe

Subject:
Location: OSFI, 121 King Street West – 19th Floor
Start:
End:
Recurrence: (none)
Meeting Status: Declined
Organizer:
Categories: Government

Teleconference; 1877-413-4792 or 613-960-7516, s 15(1)(l) – please indicate in your reply if you are attending in person or via teleconference

Agenda

- Roundtable introduction – all
- Discussion of guidance project plan (GPP) and FINTRAC consultation schedule – all
- F2R project update – Tammy Maheral
- FINTRAC Reporting Working Group update – Carrie Hagerman
- PI project update – Alain Boudreault
- Preliminary Client ID discussion – Carrie and Tammy (Guidance under GPIWG review until July 11, 2019)
- Discussion on the road ahead for GPIWG and its current mandate - all
- Next steps

If you have anything else you would like us to cover please let us know and I will add it to the agenda.

Regards, Carrie

Carrie Hagerman

Relationships and Guidance Manager, Compliance

FINTRAC | CANAFE

carrie.hagerman@fintrac-canafe.gc.ca

Telephone | 613-943-5710

Kevin Simcoe

Subject:
Location: OSFI, 121 King Street West – 19th Floor

Start:
End:
Show Time As: Tentative

Recurrence: (none)

Organizer:

Teleconference; 1877-413-4792 or 613-960-7516, s 15(1)(l) – please indicate in your reply if you are attending in person or via teleconference

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- Next steps

If you have anything else you would like us to cover please let us know and I will add it to the agenda.

Regards, Carrie

Carrie Hagerman
Relationships and Guidance Manager, Compliance
FINTRAC | CANAFE
carrie.hagerman@fintrac-canafe.gc.ca
Telephone | 613-943-5710

ACMLTF Working Group #3: FINTRAC Guidance and Policy Interpretation

Terms of Reference

This Working Group will share expertise on the interpretation of guidance, legislation, etc. Their primary role will be to identify and address guidance and interpretation issues in all sectors as well as to deal with technical issues and questions that arise. They will also provide views on the development of guidance and on regulatory/legislative measures.

Work Items will include:

- Discussions on how different members interpret specific areas of guidance;
- Outstanding issues with the current guidance;
- Suggestions on ways guidance can be improved; and
- Review and comments of draft FINTRAC guidance (if available).

Membership

FINTRAC Guidance and Policy Interpretation Working Group			
Name	Organization	Sector	Contact
Nathalie Martineau	OSFI (Lead)	Public	nathalie.martineau@osfi-bsif.gc.ca
Carrie Hagerman	FINTRAC (Lead)	Public	Carrie.Hagerman@fintrac-canafe.gc.ca
Julie Rozon	FINTRAC	Public	Julie.Rozon@fintrac-canafe.gc.ca
Erin Feeney	OSFI	Public	erin.feeney@osfi-bsif.gc.ca
Maxime Beaupré	Finance Canada	Public	maxime.beaupre@canada.ca

Methods to verify the identity of individuals and confirm the existence of corporations and entities

Summer 2019

The requirement to verify the identity of an individual and confirming the existence of a corporation or entity other than a corporation under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and associated Regulations applies to all reporting entities (REs).

This document answers the following questions:

1. What does it mean to verify the identity an individual or confirm the existence of a corporation or an entity other than a corporation?
2. How do I verify the identity of an individual?
3. How do I use an affiliate, agent, or mandatary?
4. How do I identify a child?
5. How do I confirm the existence of a corporation or an entity other than a corporation?
6. Are there restrictions on the use of personal information?

This document contains 5 Annexes:

- Annex 1: Summary of the methods to identify individuals Commented [TM1]: Link to Annex 1 at end of doc
- Annex 2: Who can identify an individual on your behalf Commented [TM2]: Link to Annex 2 at end of doc
- Annex 3: How to confirm the existence of a corporation or entity other than a corporation Commented [TM3]: Link to Annex 3 at end of doc
- Annex 4: Examples of acceptable photo identification documents Commented [TM4]: Link to Annex 4 at end of doc
- Annex 5: Examples of reliable sources of information for the dual process method Commented [TM5]: Link to Annex 5

1. What does it mean to verify the identity an individual or confirm the existence of a corporation or an entity other than a corporation?

The Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations (PCMLTFR) specify how and when you must identify an individual or confirm the existence of a corporation or an entity other than a corporation for the purpose of ensuring that the information they have given you corresponds to what you know about that client. The point at which you identify an individual or confirm the existence of a corporation or an entity other than a corporation will depend on the activity or transaction being carried out by that client. For more information on when to verify the identity of an individual or confirm the existence of a corporation or an entity other than a corporation see your sector specific guidance on When to identify individuals and confirm the existence of entities.

Commented [TM6]: Hyperlink to glossary

Commented [TM7]: Hyperlinked

2. How can I verify the identity of an individual?

An individual's identity is verified through a document or information:

- If you use a document, it must be:
 - authentic, valid and current¹; and
 - an official record, which provides evidence or facts that is either written, printed or in electronic form.
- If you use information, it must be:
 - valid and current²; and
 - from multiple sources.

Commented [MT(8)]: Link to glossary – we will need to update what is meant by authentic

You can determine the authenticity of a document in person or through an online environment by assessing the issuing authority/source of the document. Meaning, you must be satisfied that the document is authentic as issued by the legal authority of that document, based on the information and characteristics of the document (for example, character spacing, raised lettering, format, design), security features (for example, holograms, barcodes, magnetic strips, watermarks, embedded electronic chips) or markers (for example, logos, symbols). Your compliance program's policies and procedures must describe how you will assess and determine a document's authenticity.

*** Note:** If the information you gather does not match the information collected from the individual, you cannot rely on it. Verifying an individual's identity against information found through social media of any kind is not acceptable.

An individual does not need to be physically present at the time you verify their identity. For example, you can use technology to view photo identification in order to verify an individual's identity.

If you have already verified the identity of an individual you do not need to re-verify it unless you have doubts about the accuracy of the information that was used for the verification.

There are 3 ways that you can verify the identity of an individual:

- a. Single process: government-issued photo identification method³;
- b. Single process: credit file method⁴; and
- c. Dual process method⁵.

¹ Regulations registered with the Canada Gazette, and in force as of June 2019, subsection 64(1.4), pg. 82

² Regulations registered with the Canada Gazette, and in force as of June 2019, subsection 64(1.4), pg. 82

³ 64(1)(a)

⁴ 64(1)(c)

⁵ 64(1)(d)

Government-issued photo identification method

To verify the identity of an individual, you may rely on an authentic, valid and current photo identification document issued by either a federal, provincial or territorial government. You may accept a foreign government issued photo identification document if it is equivalent to a Canadian document listed in this guidance. Photo identification documents issued by municipal governments, Canadian or foreign, are not acceptable. Some examples of acceptable document are: Canadian passport, permanent resident card, and Canadian driver's license. For more examples please refer to Annex 4.

Commented [TM9]: Link to Annex 4

The photo identification document must:

1. indicate the individual's name;
2. include a photo of the individual; and
3. include a unique identifying number.

What information needs to be recorded when using the photo identification method?

If you are using the photo identification method, you must record⁶:

1. the individual's name;
2. the date on which you verified the information;
3. the type of document used (for example, driver's license, passport);
4. the unique identifying number of the document used;
5. the jurisdiction and country that issued the document; and
6. the expiry date of the document, if available (if the information appears on the document or card, you must record it).

Credit file method

To be deemed an acceptable single method, the credit file must⁷:

1. be from Canada (foreign credit files are not acceptable);
2. have been in existence for at least three years; and
3. match the name, address and date of birth that the individual provided.

* Note: If any of the information does not match, you will need to use another method to verify the individual's identity.

Credit files provide ratings on individuals ability to repay loans; however, it is possible to request a credit file to verify an individual's identifying information that does not include a credit assessment. You do not need a credit assessment to verify the identity of an individual. Equifax Canada and TransUnion Canada are Canadian credit bureaus that provide credit file information for identification purposes.

⁶ 64.2(a)

⁷ 64(1)(c)

To rely on a credit file search, you must conduct the search at the time you are verifying the individual's identity. An individual cannot provide you with a copy of their credit file, nor can a previously obtained credit file be used.

You must obtain the information through a Canadian credit bureau. It is acceptable to use an automated system to match the individual's information with the credit file information. You may also rely on a third party vendor to provide you with valid and current credit information. A third party vendor is an entity that is authorized by a Canadian credit bureau to provide access to Canadian credit information.

What information needs to be recorded when using the credit file method?

If you use this method, you must record⁸:

1. the individual's name;
2. the date you consulted or searched the credit file;
3. the name of the Canadian credit bureau holding the credit file; and
4. the individual's credit file number.

Dual process method to verify the identity of an individual

You can verify the identity of an individual using the dual process method. This method involves referring to information from two reliable sources.

How to use the dual process method to verify the identity of an individual

To verify an individual's identity by using the dual process method⁹, you must refer to any two of the following:

- information from a reliable source that contains the individual's name and address;
- information from a reliable source that contains the individual's name and date of birth; or
- information that contains the individual's name and confirms that they have a deposit account, credit card or other loan account with a financial entity.

The information may be found in documents from these sources or may be information that these sources are able to provide.

The information must be from different sources and cannot come from the person whose identity is being verified nor from the person or entity verifying the individual's identity.¹⁰ It must match what was provided by the individual.

⁸ 64.2(c)

⁹ 64(1)(d)

¹⁰ 64(1.3)

You cannot use the same source for the two categories of information you use to verify the individual's identity. For example, you cannot rely on a Canada Revenue Agency (CRA) document that contains the individual's name and address and a different CRA document that contains the individual's name and date of birth, as the CRA would be the originating source of both documents. You can, however, refer to a bank statement from Bank A that contains the individual's name and address, and confirm a deposit account with Bank B. For further precision:

1. You refer to one source to verify an individual's name and address, and refer to a different source to verify their name and date of birth.
2. You refer to one source to verify an individual's name and address, and refer to a different source to verify their name and confirm a financial account¹¹ (specifically a deposit account, credit card account or loan account).
3. You refer to one source to verify an individual's name and date of birth, and refer to a different source to verify their name and confirm a financial account (specifically, a deposit account, credit card account or loan account).

If you refer to information in a document, the document must be authentic, valid and current and must therefore not be expired. If there is no expiry date, it must be the most recent version of the document. For example, if an individual provides you with a credit card statement or a Canada Revenue Agency (CRA) notice of assessment, it must be the last one produced by the institution and received by the individual.

What is a reliable source of information?

A reliable source is an originator or issuer of information that you trust for your verification of identity of an individual. To be considered reliable, the source should be well known and considered reputable. For example, a reliable source could be the federal, provincial, territorial or municipal levels of government, crown corporations, financial entities or utility providers. See Annex 5 for a table outlining reliable sources of information for the dual process method.

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How to use a credit file under the dual process method to verify the identity of an individual

A Canadian credit file can be referred to as one of the two required sources of information. It can be used to verify the individual's name and address, name and date of birth, or to verify the individual's name and confirmation that the individual has a financial account with a financial entity. The credit file has to have been in existence for at least 6 months.

Information from a second source, for example, a CRA notice of assessment, must be used to verify the second category of information under the dual process method. In this instance, the two sources are the Canadian credit bureau that provided the credit file

¹¹ 64(1)(d)(iii)

information and the CRA that provided the notice of assessment. The information verified with these two sources must match the information provided by the individual.

You can also rely on information from a Canadian credit bureau if it acts as an aggregator and if it compiles information from different sources (often referred to as tradelines). In this instance, the Canadian credit bureau must provide you with information from two independent tradelines that verify two of either: the individual's name and address, the individual's name and date of birth, or the individual's name and confirmation of a financial account. **Each tradeline is a distinct source, the credit bureau is not a source.**

The tradelines cannot be your own, as the reporting entity verifying the individual's identity, and each tradeline must originate from a different source.

What information needs to be recorded when using the dual process method?

There are specific records you must keep if you are using this method to verify an individual's identity. You must record¹² :

1. the individual's name;
2. the date you verified the information;
3. the name of the two different sources that were used to verify the individual;
4. the type of information consulted (for example, utility statement, bank statement, marriage license, CRA notice of assessment); and
5. the account number associated with the information,
 - a. If there is no account number, a reference number that is associated with the information. ***Note:** It is not acceptable to rely on information if the account number or reference number is truncated or redacted.

3. How do I use an affiliate, agent or mandatary?

To verify the identity of an individual, you can rely on:

- a domestic or foreign affiliate¹³;
- a financial entity that is subject to the PCMLTFA and a member of your financial services cooperative or credit union central¹⁴; or
- an agent or mandatary¹⁵.

Affiliates, agents and mandataries you rely on to verify the identity of individuals must do so in accordance with the obligations under the PCMLTFR as it was written at the time of the verification. You are legally responsible for verifying client identity, even if

¹² 64.2(d)

¹³ 64(1)(e)(i) and 64(1)(e)(ii)

¹⁴ 64(1)(e)(iii)

¹⁵ 64.1 (1)

you rely on someone else to do so. If you have any concerns about the methods or information that they used to verify their identity, you should re-verify the individual's identity.

Affiliates

What are domestic and foreign affiliates?

An entity is an affiliate of another entity if one of them is wholly owned by the other, if both are wholly owned by the same entity or if their financial statements are consolidated.

To rely on domestic affiliates for client identification purposes, they must be a bank, authorized foreign bank, cooperative credit society, savings and credit union, caisse populaire, life insurance company, trust company, loan company, or securities dealer. In other words, a domestic affiliate must be recognized as an entity under paragraphs 5(a) to (g) of the PCMLTFA.

To rely on foreign affiliates for client identification purposes, they must carry out activities outside of Canada that are similar to the activities of a person or entity referred to in any of paragraphs 5(a) to (g) of the PCMLTFA.

What is a financial entity that is a member of your financial services cooperative or credit union central?

Financial services cooperatives or credit union centrals act on behalf of a membership composed of financial entities and can provide financial services to that group.

A financial services cooperative is regulated by the Act respecting financial services cooperatives or the Act respecting the Mouvement Desjardins.

A credit union central is a central cooperative credit society under the Cooperative Credit Associations Act or a credit union central, federation of credit unions, or caisses populaires regulated by provincial Acts outside of Quebec.

You can rely on a member of your financial services cooperative or credit union central to verify the identity of an individual.

How can an affiliate or a member of the same financial services cooperative or credit union central be used to verify the identity of individuals?

To rely on a domestic affiliate, foreign affiliate or a member of the same financial services cooperative or credit union central to verify the identity of an individual, you must:

- confirm that they verified an individual's identity using either the single or dual process methods for identification; and

- verify that the individual's name, address and date of birth in their record are those of your client.

What information needs to be recorded when you rely on an affiliate to verify the identity of an individual?

When you rely on an affiliate to verify the identity of an individual, you must record¹⁶:

- the date on which your affiliate verified the identity of the individual;
- the name of your affiliate that verified the individual's identity;
- the method that your affiliate used to verify the individual's identity; and
- the information that your affiliate recorded based on the method the affiliate used.

* Note - If the affiliate verified the identity of the individual in accordance with the methods to verify identification that were in force prior to June 2017, you must record:

- the method that your affiliate used to verify the individual's identity, as they read at the time; and
- the information that was required to be recorded based on the method¹⁷ the affiliate used.

Agent or mandatary

How can an agent or mandatary be used to verify the identity of an individual¹⁸?

You can rely on an agent or mandatary to verify the identity of an individual for you and can also rely on the measures previously taken by an agent or mandatary¹⁹ if they were:

- acting in their own capacity at the time, whether or not they were required to use the methods prescribed in the PCMLTFR²⁰; or
- acting as an agent or mandatary under a written agreement or arrangement that was entered into with another reporting entity for the purposes of verifying identity²¹ using the methods.

If you rely on the measures taken by an agent or mandatary you must²²:

- have a written agreement or arrangement with the agent or mandatary before you rely on them to verify an individual's identity²³;

¹⁶ 64.2(e)

¹⁷ 64(1) or 64(1.1)

¹⁸ 64.1

¹⁹ 64.1(1) and (2)

²⁰ 64.1(2)(a)

²¹ 64.1(2)(b)

²² 64.1(3)

²³ 64.1(3)(a)

- obtain, as soon as feasible, all the information referred to by the agent or mandatary and the verified: name, address, date of birth²⁴, or confirmation of a financial account of the individual; and
- be satisfied that the information is valid and current and that the individual's identity was verified using one of the prescribed identification methods²⁵.

This means that you can rely on identification information previously collected by an agent or mandatary. For example, if the agent verified the identity of the individual for another entity, you can rely on it for your purposes.

What information needs to be recorded when you rely on an agent or mandatary to verify the identity of an individual?

If an agent or mandatary verified the identity of an individual on your behalf, you must have a record²⁶ of:

- the written agreement or arrangement with the agent or mandatary for verifying identity;
- the information that the agent or mandatary used to verify the individual's identity; and
- the information that the agent or mandatary verified about the individual.

4. How do I identify a child?

If a child is under 12 years of age, you must verify the identity of one parent or guardian and record that parent or guardian's information. You can rely on the information provided by the parent or the guardian or tutor in order to record the child's identification details²⁷.

If a child is between 12 and 15 years of age, you can verify their identity directly by using a single or dual process method to verify identity.

If this is not possible, you can rely on one source of information that contains the name and address of the child's parent or guardian or tutor and a second source that contains the child's name and date of birth. For example, if the child has a passport you can use it to verify their identity, if not, you could rely on the parent's driver's license to verify their common address and the child's birth certificate to verify the child's name and date of birth.

²⁴ 64.1(3)(b)

²⁵ 64.1(3)(c)

²⁶ 64.1(3)(a) to (c)

²⁷ 64(1.1)

5. How do I confirm the existence of a corporation or an entity other than a corporation?

An entity can be a corporation, trust, partnership, fund, or unincorporated association or organization. However, there are differences in the requirements depending on whether the entity is a corporation versus an entity other than a corporation.

Corporations

To confirm the existence of a corporation, you can refer to either a paper record or an electronic record that was obtained from a source that is accessible to the public²⁸, such as:

- its certificate of incorporation;
- a certificate of corporate status;
- a record that has to be filed annually under provincial securities legislation; or
- the most recent version of any other record that confirms the corporation's existence, such as the corporation's published annual report signed by an audit firm, or a letter or notice of assessment for the corporation from a municipal, provincial, territorial or federal government.

You must use these records to confirm the corporation's name, and verify its address and the names of its directors. In the case of a corporation that is a securities dealer, you do not need to confirm the names of its directors when you confirm its existence²⁹.

You do not have to re-confirm the corporation's existence unless you have doubts about the accuracy of the information that was used to confirm its existence³⁰.

An entity other than a corporation

To confirm the existence of an entity, other than a corporation, you can refer to a paper or an electronic record obtained from a source that is accessible to the public³¹, such as:

- a partnership agreement;
- articles of association; or
- the most recent version of any other similar records that confirms its existence.

You do not have to re-confirm the entity's existence unless you have doubts about the accuracy of the information that was used to confirm its existence³².

²⁸ 65(1)

²⁹ 63(4)

³⁰ 63(2)

³¹ 66(1)

³² 63(3)

Records required when confirming the existence of a corporation or an entity other than a corporation

If you refer to a publicly accessible record electronically to confirm the existence of a corporation or entity other than a corporation, you must keep a record of:

- the corporation's registration number³³ or the entity's registration number³⁴;
- the type of record consulted; and
- the source of the electronic version of the record.

If you consult a paper record to confirm the existence of a corporation or entity other than a corporation you must either retain the record or keep a copy of it³⁵.

Personal information

The use of personal information in Canadian commercial activities is protected by the Personal Information Protection and Electronic Documents Act (PIPEDA), or by substantially similar provincial legislation. You have to inform clients about the collection of their personal information. However, you do not have to inform them when you include their personal information in the reports you are required to submit to FINTRAC.

The Office of the Privacy Commissioner of Canada can provide further guidance, and has created a Question and Answer document about PIPEDA and the Proceeds of Crime (Money Laundering) and Terrorist Financing Act, that will help clarify your responsibilities under both federal laws.

For further information, please contact FINTRAC.

³³ 65(3)

³⁴ 66(3)

³⁵ 65(4) and 66(4)

Annex 1: Summary of methods to identify an individual and associated record keeping obligations

Identification method	Documents or information to review	Identification details that must match the client	Information that must be recorded
Photo identification	Photo identification document issued by a government that is authentic, valid and current	Name and photograph	<ul style="list-style-type: none"> Individual's name Type of document Document number Issuing jurisdiction and country Expiry date Date of verification
Credit file	Canadian credit file in existence for at least three years	Name, address and date of birth	<ul style="list-style-type: none"> Individual's name Source of credit file Number of the credit file Date of verification
Dual process	Valid and current information from two reliable sources	Name and address; or name and date of birth; or name and confirmation of a financial account	<ul style="list-style-type: none"> Individual's name Name of the two different sources used to identify the individual Type of information Account number or number associated with the information Date of verification

Annex 2: Summary of who you can rely on to identify an individual

Who	Documents or information to review	Identification details that must match	Information that must be recorded
Affiliate that verified the identity of the individual: <ul style="list-style-type: none"> a domestic affiliate; a foreign affiliate; or a member of the same financial services cooperative or credit union central. 	Verify that the name, address and date of birth in the affiliate's records are those of the individual.	The identification information listed under the identification method used	<ul style="list-style-type: none"> Individual's name Date of verification Name of the entity that previously verified identity Identification method used to verify the individual's identity Information that must be recorded according to the identification method used
Agent or mandatory who: <ul style="list-style-type: none"> acted in their own capacity; acted for you acted as an agent or mandatory under a written agreement or arrangement with another person or entity for the purposes of verifying identity 	Verify that the information is valid and current and that the individual's identity was verified using one of the prescribed identification methods	The identification information listed under the identification method used	<ul style="list-style-type: none"> A written agreement or arrangement with the agent or mandatory for the purpose of verifying identity All of the information that the agent or mandatory consulted when verifying the individuals identity The information that the agent or mandatory verified about the individual

Annex 3: Summary of how to confirm the existence of corporations or entities

Entity confirmation	Documents to review	Information that must be recorded
Confirming the existence of an entity that is a corporation	<p>Documents that you can rely on to confirm the existence of a corporation:</p> <ul style="list-style-type: none"> • certificate of incorporation • certificate of corporate status • record that has to be filed annually under provincial securities legislation • published annual report signed by an audit firm • letter or notice of assessment from a municipal, provincial, territorial or federal government 	<p>If you consulted an electronic document:</p> <ul style="list-style-type: none"> • registration number; • type of document consulted; and • source of the electronic document. <p>If you consulted a paper document:</p> <ul style="list-style-type: none"> • the paper document, or a copy of it.
Confirming the existence of an entity other than a corporation	<p>Documents that you can rely on to confirm the existence of an entity other than a corporation:</p> <ul style="list-style-type: none"> • a partnership agreement • articles of association • any other similar record that confirms the entity's existence. 	<p>If you consulted an electronic record:</p> <ul style="list-style-type: none"> • registration number; • type of record consulted; and • source of the electronic record. <p>If you consulted a paper document:</p> <ul style="list-style-type: none"> • the paper document, or a copy of it.

Annex 4: Examples of acceptable photo identification documents

The following list provides examples of acceptable government-issued photo identification documents from federal, provincial or territorial authorities. This is not an exhaustive list.

Type of card or document	Issuing jurisdiction and country
Permanent resident card	Canada
Citizenship card, (issued prior to 2012)	Canada
Secure Certificate of Indian Status	Canada
Driver's licenses	
British Columbia Driver's Licence	British Columbia, Canada
Alberta Driver's Licence	Alberta, Canada
Saskatchewan Driver's Licence	Saskatchewan, Canada
Manitoba Driver's Licence	Manitoba, Canada
Ontario Driver's Licence	Ontario, Canada
Québec Driver's Licence	Québec, Canada
New Brunswick Driver's Licence	New Brunswick, Canada
Nova Scotia Driver's Licence	Nova Scotia, Canada
Prince Edward Island Driver's Licence	Prince Edward Island, Canada
Newfoundland and Labrador Driver's Licence	Newfoundland and Labrador, Canada
Yukon Driver's Licence	Yukon, Canada
Northwest Territories Driver's Licence	Northwest Territories, Canada
Nunavut Driver's Licence	Nunavut, Canada
DND 404 Driver's Licence	Department of National Defence, Canada
Provincial services cards	
British Columbia Services Card	British Columbia, Canada
Provincial or territorial identity cards	
British Columbia Enhanced ID	British Columbia, Canada
Alberta Photo Identification Card	Alberta, Canada
Saskatchewan Non-driver photo ID	Saskatchewan, Canada
Manitoba Enhanced Identification Card	Manitoba, Canada

<u>Ontario Photo Card</u>	Ontario, Canada
<u>New Brunswick Photo ID Card</u>	New Brunswick, Canada
<u>Nova Scotia Identification Card</u>	Nova Scotia, Canada
<u>Prince Edward Island Voluntary ID</u>	Prince Edward Island, Canada
<u>Newfoundland and Labrador Photo Identification Card</u>	Newfoundland and Labrador, Canada
<u>Yukon General Identification Card</u>	Yukon, Canada
<u>Northwest Territories General Identification Card</u>	Northwest Territories, Canada
<u>Nunavut General Identification Card</u>	Nunavut, Canada
Types of card or international document	
<u>United States Nexus pass</u>	United States
<u>France driver's license</u>	France
<u>Australian passport</u>	New South Wales, Australia

* **Note:** You cannot use a provincial health card for identification purposes where it is prohibited by provincial legislation.

Annex 5: Examples of reliable sources of information for the dual process method

This is not an exhaustive list. You must always rely on valid and current information.

Reliable sources of information to verify name and address	Reliable sources of information to verify name and date of birth	Reliable sources of information to verify name and confirm a financial account (specifically a deposit account, credit card account or loan account)
<p>Issued by a Canadian government body</p> <ul style="list-style-type: none"> Any card or statement issued by a Canadian government body (federal, provincial, territorial or municipal): <ul style="list-style-type: none"> Canada Pension Plan (CPP) statement Property tax assessment issued by a municipality Provincially issued vehicle registration Benefits statement: <ul style="list-style-type: none"> Federal, provincial, territorial, and municipal levels CRA documents: <ul style="list-style-type: none"> Notice of assessment Requirement to pay notice Installment reminder / receipt 	<p>Issued by a Canadian government body</p> <ul style="list-style-type: none"> Any card or statement issued by a Canadian government body (federal, provincial, territorial or municipal): <ul style="list-style-type: none"> Canada Pension Plan (CPP) statement of contributions Birth certificate Marriage certificate or government-issued proof of marriage document (long-form which includes date of birth) Divorce documentation Permanent resident card Citizenship certificate Temporary driver's licence (non-photo) <p>Issued by other Canadian sources</p> <ul style="list-style-type: none"> Canadian credit file that has been in existence for at least 6 months Insurance documents (home, auto, life) 	<p>Confirm that the individual has a deposit account, credit card or loan account by means of:</p> <ul style="list-style-type: none"> Credit card statement Bank statement Loan account statement (for example, mortgage) Cheque that has been processed (cleared, insufficient funds) by a financial institution Telephone call, email or letter from the financial entity holding the deposit account, credit card or loan account. Product from a Canadian credit bureau (containing two trade lines in existence for at least 6 months) Use of micro-deposits

<ul style="list-style-type: none">o GST refund lettero Benefits statement <p>Issued by other Canadian sources</p> <ul style="list-style-type: none">• Utility bill (for example, electricity, water, telecommunications)• Canada 411• T4 statement• Record of Employment• Investment account statements (for example, RRSP, GIC)• Canadian credit file that has been in existence for at least 6 months• Product from a Canadian credit bureau (containing two trade lines in existence for at least 6 months) <p>Issued by a foreign government</p> <ul style="list-style-type: none">• Travel visa	<ul style="list-style-type: none">• Product from a Canadian credit bureau (containing two trade lines in existence for at least 6 months)
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